ENSV FY05
Inspection Transmittal Form

Todays Date: 12/22/200

INSPECTION ACTIVITY

Media	Type of Inspection	Targeting Rationale	Compliance Officer	Inspection Date
RCRA	SEE- CEI	SEE followup/other		

Inspector	Activity #
Cherry- G	

FACILITY INFORMATION

Facility Name	ID Number	NAICS/SIC Code
Alter Scrap Processing	None	

Address	City	County	State	ZIP
640 Schmidt Road	Davenport		IA	52802

Facility Activity

Recyclable material wholesalers - applicate demanufacture.

INSPECTION FINDINGS

NOV/NOPF Issued? ( ) Yes (•) No ( ) N/A Potential SNC? ( ) Yes (•) No ( ) N/A

Preliminary Findings (briefly list regulatory deficiencies)

Comments

Alter Scrap Metal and Alter Metal both operate under Alter Trading Company.

MULTIMEDIA FINDINGS

MM Participating Program* | MM Level | MM Type

Potential EJ? ( ) Yes (•) No ( ) N/A

MM Screening completed? (•) Yes ( ) No ( ) N/A

SBREFA handout provided? (•) Yes ( ) No ( ) N/A

If yes, was MM Screening Checklist forwarded? (•) Yes ( ) No

If yes, who? > [ ] CAA [x] EPCRA/TSCA [ ] SPCC [x] CWA [ ] UST [ ] PWS [ ] UIC [ ] Wetlands [ ] RCRA [ ] CFC [ ] EJ [ ] All

* A=CAA, W=CWA, R=RCRA, E/T=EPCRA/TSCA, U=UST, C=CFC, S=SPCC, U-I=UIC, Wet., PWS, All

RCRA

551224

Report of RCRA Compliance Evaluation Inspection

At

Alter Metal Company
640 Schmidt Road
Davenport, Iowa 52802
Mailing Address: 2333 Rockingham Road 52808
(563) 328-3601
(800) 553-6722
FAX: (563) 328-3609

RCRA EPA ID Number: IAD005263751

On

December 1, 2004

By U.S. Environmental Protection Agency
Region 7
Environmental Services Division

INTRODUCTION

At the request of the Air, RCRA (Resource Conservation and Recovery Act) and Toxics Division (ARTD), I conducted a RCRA Compliance Evaluation Inspection (CEI) at the Alter Metal Company facility located in Davenport, Iowa, on December 1, 2004. This CEI was conducted under the authority of Section 3007(a) of RCRA, as amended. During the CEI, I collected the information and data necessary to determine compliance with the applicable regulatory and statutory requirements. This inspection report and attachments present the results of the CEI. The CEI was conducted as a Level B Multimedia Inspection, and the Region 7 Multimedia Screening Checklist is included as attachment 1. Based on information obtained during the course of the inspection, I inspected the facility as a Conditionally Exempt Small Quantity Generator (CESQG) of hazardous waste and a generator of used oil.

My inspection was initiated as the result of an previous inspection of the Alter Metal appliance demanufacturing process which was conducted by the Iowa Department of Natural Resources (IDNR) on February 20, 2003. During this inspection, IDNR determined that PCBs, lead and mercury in the demanufacturing shredder fluff exceeded TCLP limits (attachment 7). My inspection was to determine Alter Metal's compliance with RCRA regulations during the demanufacturing process.

PARTICIPANTS

The following persons participated in the inspection.

Alter Metal Company/Alter Scrap Processing (Alter):
Chris Morehouse, Yard Manager
Guy Jackson, Corporate Director of Safety (St. Louis Corporate Headquarters)
Denny Chenoweth, Supervisor

U.S. Environmental Protection Agency (EPA):
Glenn Cherry, Civil Investigator/NOWCC/SEE

INSPECTION PROCEDURE

Prior to entering the Alter facility, I conducted a visual reconnaissance of the facility grounds, searching for areas of concern observable from the adjacent roadways. I identified no environmental issues or concerns during this preliminary examination.

The location for my inspection had previously been identified as Alter Metal Company at 640 Schmidt Road, however, a sign at that location identified the facility as Alter Scrap Processing, **see photo 1**. Subsequently, I found that Alter Metal and Alter Scrap Processing are subsidiaries of Alter Trading Corporation. I drove onto the yard and contacted a worker who informed me that the administrative offices were at the Alter Trading Corporation, immediately to the north, at 626 Schmidt Road.

I arrived unannounced at the Alter facility on the morning of December 1 , 2004, at approximately 0900 hours. I entered the front door of the Alter Trading Corporation and contacted an employee from a phone on the front counter. A short time later, Mr. Morehouse responded to my location. I identified myself to him and informed him that I was at Alter to conduct a CEI. Mr. Morehouse then escorted me to an adjoining conference room where we met Mr. Chenoweth and Mr. Jackson. Mr. Jackson is the Corporate Safety Director working out of Corporate Headquarters in St. Louis, Missouri. I briefly explained the purpose for my visit and presented my credentials to Mr. Morehouse. Mr. Morehouse examined and returned the credentials and stated that he has been the yard manager for Alter Scrap Processing and Alter Metal two and a half years. Mr. Morehouse served as the official facility representative during the inspection.

During the initial conference, I explained in detail the purpose of the inspection, and the procedures that I would follow. I presented Mr. Morehouse with a copy of RCRA Section 3007(a), which provides my authority for conducting RCRA inspections. I also presented Mr. Morehouse with a copy of Title 18 U.S. Code, Sections 1001 and 1002, which provide penalties for providing false and/or misleading information to Federal representatives, and for the possession and use of fraudulent documents. Mr. Morehouse reviewed and retained both of these

documents. I followed this with an explanation to Mr. Morehouse of how important it was for me to collect truthful and accurate information, and that he should inform me if he was not certain of the information that he was providing, or if he was unable to answer a question. I next explained the EPA policy regarding the collection of confidential business information (CBI) to Mr. Morehouse.

I stated that Alter could claim any information or documentation as confidential during or after the completion of the inspection. I explained that, at the conclusion of the inspection, Alter would be provided with a copy of the EPA Confidentiality Notice, with which a CBI claim could be made for any or all of the information and documentation collected during the inspection. The inspection consisted of a discussion of the Alter facility operations, waste generation and waste management practices, a review of required records, and a visual examination of the facility. Information collected during the inspection is documented on the RCRA CEI data gathering sheets (attachment 9). I also completed the Region 7 Multimedia Screening Checklist (attachment 1).

I asked Mr. Morehouse to review the RCRAInfo Handler Information Report (attachment 12) to verify the information that it contained. Mr. Morehouse stated that Alter Metal Company and Alter Scrap Processing are separate subsidiaries under the ownership of Alter Trading Corporation. Mr. Morehouse stated that Alter Metal did not generate any RCRA regulated waste but that Alter Scrap Processing did. Mr. Morehouse could not explain why a RCRA ID number had been obtained under the name of Alter Metal instead of Alter Scrap Processing. During the interview, however, I determined that Alter Metal and Alter Scrap Processing share space at 640 Schmidt Road, and that Mr. Morehouse is the yard manager for both. Mr. Morehouse is also the CEO for Alter Trading. Alter Metal and Alter Scrap Processing are, therefore, considered to be one facility for the purpose of this inspection.

Mr. Morehouse provided all information collected during the inspection, and accompanied me during the visual examination of the Alter facility. Mr. Chenoweth and Mr. Jackson also accompanied us.

At the conclusion of the inspection, I summarized and reviewed my findings and recommendations with Mr. Morehouse. Next, I provided Mr. Morehouse with a Confidentiality Notice, which he signed indicating that no claim of confidentiality was being made by Alter (attachment 2). I also provided Mr. Morehouse with a Receipt for Documents and Samples, which he signed, listing the copies of documents that he had provided to be included in the inspection report. I informed Mr. Morehouse that I had not observed any violations of RCRA regulations during my inspection, but further stressed that the final decision would be made by an EPA compliance officer.

The following inspection documents and compliance assistance handouts were left with Mr. Morehouse:

RCRAInfo Handler Information Report (white copy of printout)
Notification of Regulated Waste Activity (EPA booklet)
Publications for Small Businesses (EPA booklet)

Compliance Assistance Centers (EPA information sheet of web-based centers)
Managing Your Hazardous Waste,- A Guide for Small Business (EPA booklet)
Commercial Motor Vehicle Transportation Security Planning (EPA information sheet)
Security Awareness (EPA pamphlet)
Small Business Resources Information Sheet (EPA information sheet)
The Iowa Business Assistance Team (organization pamphlet)
Iowa Waste Reduction Center (organization pamphlet)
Pollution Prevention Services (Iowa Department of Natural Resources pamphlet)
Confidentiality Notice (completed carbon copy)

FACILITY DESCRIPTION

Facility Operations

Alter Trading Corporation is a holding company located at 626 Schmidt Road in Davenport, Iowa. Subsidiaries of Alter Trading Corporation are Alter Scrap Processing, a wholesaler of scrap metal, and Alter Metal, which is an appliance demanufacturer. Both are located at 640 Schmidt Road and share workers. Area maps, informational printouts and a satellite image are attachment 10 and 11. The locations of 626 and 640 Schmidt Road are contiguous. Mr. Morehouse is the CEO of Alter Trading Corporation and as the Yard Manager for Alter Scrap Processing and Alter Metal.

Alter Scrap Processing is a wholesaler of scrap metal. Most of the incoming scrap metal has already been processed, crushed and baled for recycling prior to delivery to the Alter facility. Other scrap metal is accepted at the 640 Schmidt Road facility for processing and is separated by category for shipment. Other scrap metal may be processed through a shearer or a shredder to prepare it for shipment. According to Mr. Morehouse, the scrap metal has already been processed to remove regulated material before it is accepted by Alter.

Alter Metal is an appliance demanufacturing company that removes recyclable material and regulated material from the appliances. Mr. Morehouse stated that all appliances are checked through a radiation detector before they are taken to the demanufacturing area. Workers then remove salvageable material for further processing. In the area designated for appliance demanufacturing, I observed two 55 gallon drums, closed and in good condition. One of the drums was marked to indicate that it contained capacitors and the other was marked to indicate that it contained ballast. Both drums contained PCB labels and were dated, **see photos 2 and 3**. Mr. Morehouse stated that after all recyclables are removed, the non-metallic and non-regulated material is then shredded and the fluff from the demanufacturing process is disposed of at the Scott Area Landfill. The fluff was sampled and tested as the result of the IDNR inspection, and has been determined to be non-hazardous waste (attachment 8).

Facility Status

Alter has submitted a Notification of Regulated Waste Activity and is listed in RCRAInfo. During the course of this inspection, I collected information that shows Alter is operating as a CESQG of D001 hazardous waste from one parts washer and as a generator of used oil.

FINDINGS AND OBSERVATIONS

Description of Facility Wastes and Waste Management

Solvent Parts Washer Waste - In the shop, I observed a 15 gallon parts washer that is provided by Safety Kleen, **see photo 4**. The solvent used is Safety-Kleen 105 Solvent which has a flash point of 105^0 Fahrenheit and is classified and managed by Alter as D001 with the characteristic of ignitability (MSDS, attachment 6). Alter generates approximately 15 gallons of spent solvent per month. The spent solvent is picked up and recycled by Safety-Kleen. The spent solvent is not manifested because of Alter's status as a CESQG.

Used Oil - Alter generates around 400 gallons of used oil per month from the maintenance of production equipment. During my visual inspection, I observed a 100 gallon collection tank and a 750 gallon storage tank in a lean-to type shed toward the north end of the yard. Mr. Morehouse stated that the used oil is poured into the collection tank, **photo 5,** and periodically pumped into the 750 gallon storage tank . I observed that both tanks were in good condition and were labeled as used oil, **see photos 6 and 7.** The 750 gallon storage tank was also inside a secondary containment. The used oil was picked up by Jacobus until June of 2003, and is now picked up for recycling by Safety-Kleen (attachment 4). The following table documents shipment dates and amounts:

DATE	TRANSPORTER	AMOUNT
1/23/02	Jacobus	780 gallons
9/11/02	Jacobus	500 gallons
2/26/03	Jacobus	1,500 gallons
4/16/03	Jacobus	410 gallons
4/23/03	Jacobus	500 gallons
4/28/03	Jacobus	250 gallons
5/1/03	Jacobus	175 gallons
5/30/03	Jacobus	550 gallons
6/11/03	Safety-Kleen	500 gallons
6/11/03	Safety-Kleen	100 gallons (oil and water mix)
6/2/04	Safety-Kleen	900 gallons
11/15/04	Safety-Kleen	900 gallons

Summary

Alter Trading, Alter Scrap Processing and Alter Metal share contiguous space and share workers. Mr. Morehouse is the CEO for Alter Trading and is the yard manager for Alter Metal and Alter Scrap Processing, therefore, they were inspected as one facility. Alter is a CESQG of less than 100 kg per month of D001 hazardous waste and is a generator of used oil. During the exit interview, I informed Mr. Morehouse that I had not observed any violations of RCRA regulations, but stressed to him that final determination would be made by an EPA compliance officer and that Alter would be notified in writing when the decision is made.

Glenn Cherry
Civil Investigator, NOWCC/SEE

Date: 12-20-04

ATTACHMENTS

1. Region 7 Multimedia Screening Checklist (one 2-sided page)
2. Inspection Confidentiality Notice form (1 page)
3. Receipt for Documents form (1 page)
4. Safety-Kleen Used Oil Manifest (1 page)
5. Safety-Kleen Spent Solvent Receipt (1 page)
6. Safety-Kleen 105 Solvent MSDS (12 pages)
7. IDNR Inspection Report and Letter (12 pages)
8. Response to IDNR Inspection (8 pages)
9. CEI Checklists (9 pages)
10. Area Map and Satellite Image (2 pages)
11. Alter Reference Documents (5 pages)
12. Handler Information Report form (1 page)
13. Photos (7 photos, 3 pages)

Forward To: EJ ☐ TSCA/EPCRA ☒ CWA ☒ Wetlands ☐ UIC ☐ PWS ☐ CAA ☐ CFC ☐ RCRA ☐ UST ☐ SPCC ☐

REGION VII MULTIMEDIA SCREENING CHECKLIST

Facility Name: ALTER METAL CO.
Facility Ownership: ALTER TRADING CORP
Street: 640 SCHMIDT ROAD
City: DAVENPORT State: IA Zip: 52802
Phone: 563-328-3609 Facility Contact: CHRIS MOREHOUSE
Number of Employees: 55 Work Hours/Shifts 1 - 6 DAYS
Facility activity and major process description: RECYCLABLE MATERIAL WHOLESALER

Inspector: GLENN GILMORE
Primary Media: RCRA
Inspector Phone Ext.: 7155
Date: 12-1-04
SIC code 42193

(Check all that apply): Painting/Coating (Water-based ☐, Solvent-based ☐); Printing ☐; Reacting ☐; Formulating ☐; Distilling ☐; Parts Washers/Degreasing (Water-based ☐, Halogenated-based ☐, Non-halogenated-based ☐); Combustion (boiler, furnaces, oxidizers) ☐; Electroplating (Chrome ☐, Other_____); Electro-less plating(Type_____)

ENVIRONMENTAL JUSTICE (Note: Forward to EJ if a concern is identified during your inspection or in one of the areas below)

1. Is the facility located in a low income area (e.g., with many abandoned and dilapidated properties)? No ☒ (stop) Yes ☐
   ☞ If yes, is facility less then 1000 feet from nearest routinely occupied property (house, school, etc.)? No ☐ (stop) Yes ☐ → *Forward to EJ*

TOXIC SUBSTANCES CONTROL ACT (TSCA) EMERGENCY PLANNING & COMMUNITY RIGHT TO KNOW ACT (EPCRA)

1. Does facility use more than 200 gallons or 1,500 pounds per month of the following (check all that apply): Acids ☐, Bases ☐, Anhydrous Ammonia ☐, Chlorine ☐, Chlorinated Solvents ☐, Solvent-Based Paints ☐, or Solvents ☐? No ☒ (stop) Yes ☐
   ☞ If yes, have Toxic Chemical Release Forms (Form R) been submitted to EPA or State? Yes ☐ (stop) No ☐ → *Forward to TSCA*
2. Does facility store more than 100 gallons or 1,000 pounds of the following (check all that apply): Acids ☐, Bases ☐, Bulk Chemicals ☐, Anhydrous Ammonia ☐, Chlorine ☐, Chlorinated Solvents ☐, Fuels ☒, Gases ☐, Solvent-Based Paints ☐, Solvents ☐? No ☐ (stop) Yes ☒
   ☞ If yes, have Hazardous Chemical Inventory Forms (Tier II) been submitted to local and state governments (Emergency Planning Committees or State Emergency Response Commission)? Yes ☒ No ☐ → *Forward to EPCRA*
   ☞ If yes, have Risk Management Plans been submitted to EPA under Section 112r of the CAA? Yes ☒ No ☐ → *Forward to EPCRA*
3. Does the facility have any equipment that contains PCB's at concentrations >500 ppm? No ☒ (stop) Yes ☐
   ☞ If yes, is equipment leaking (including wet or weeping equipment)? No ☐ (stop) Yes ☐ → *Forward to TSCA* *(Get Photo)*

CLEAN WATER ACT (CWA) - National Pollution Discharge Elimination System (NPDES), Industrial Pretreatment, Storm Water, & Wetlands

1. Does the facility discharge any wastewater to storm sewers, surface water, or the land? No ☒ (stop) Yes ☐
   ☞ If yes, are all wastewater discharges permitted? Yes ☐ No ☐ → *Forward to CWA*
2. Does the facility have process wastewaters that are discharged to a city POTW (Publically Owned Treatment Works)? No ☒ (stop) Yes ☐
   ☞ If yes, are the discharges permitted by: State? ☐, City? ☐ – If yes, Stop here. No ☐ → *Forward to CWA*
   ☞ If yes, does the city have a state or EPA approved pretreatment program? Yes ☐ No or Don't Know ☐ → *Forward to CWA*
3. During rainfall events, can storm water carry pollutants from manufacturing, processing, storage, disposal, shipping and receiving areas, or from construction sites >5 acres, to storm sewers or surface water? No ☐ (stop) Yes ☒
   ☞ If yes, does the facility have an NPDES permit for these storm water discharges? Yes ☒ No ☐ → *Forward to CWA*
4. Did you see any wastewater discharges not identified by the facility? No ☒ (stop) Yes ☐ - Identify location, time, appearance of discharge: _____ *(Get Photo)* → *Forward to CWA*

WETLANDS

1. Does the facility have any wetland areas (e.g. streams, ponds, or temporarily wet areas)? No ☒ (stop) Yes ☐
   ☞ If yes, have any wetland areas that have been dredged or filled, channelized, dammed, or had gravel removed from within the last 5 years? No ☐ (stop) Yes ☐ - Identify location and timeframe_____ *(Get Photo)* → *FWD to Wetlands*

SAFE DRINKING WATER ACT (SDWA) - Underground Injection Control (UIC) & Public Water System (PWS)

1. Does facility discharge any liquids to the subsurface (septic systems, disposal wells, cesspools, etc.)? No ☒ (stop) Yes ☐ → *Forward to UIC*
   ☞ If yes, do these liquid wastes consist of sanitary wastewater only? Yes ☐ No ☐
2. Does facility provide drinking water to 25 people or more from its own source (private well, pond, etc)? No ☒ (stop) Yes ☐ → *Forward to PWS*
   ☞ If yes, does the facility test or monitor its drinking water in order to comply with state regulations? Yes ☐ No ☐

CLEAN AIR ACT (CAA) and CFCs

1. Do you see any dense, non-steam, smoke or dust emissions leaving the facility property? No ☒ Yes ☐ → *Forward to CAA*
   Source _____ *(Get Photo)*
2. Does the facility have any new air pollution emitting equipment that was constructed or installed in the past 5 years? No ☒ (stop) Yes ☐
   ☞ If yes, is equipment permitted? Yes ☐ No ☐ → *Forward to CAA Describe:* _____
   _____
3. Does the facility have any cooling units that contain >50 lbs of refrigerant? No ☒ (stop) Yes ☐ → *Forward to CFC*
   ☞ If yes, are these units: Self-serviced? ☐ Contract Serviced? ☐ - Service Company: _____
4. Does the facility service motor vehicle air conditioning systems? No ☒ (stop) Yes ☐ → *Forward to CFC*

RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) and UNDERGROUND STORAGE TANKS (UST)

1. Does the facility generate more than 30-gallons (220 lbs./100kg) of hazardous waste per month or at any one time? No ☐ (stop) Yes ☐
   ☞ If yes, does facility have an EPA Hazardous Waste Identification Number? Yes ☐ (stop) No ☐ → *Forward to RCRA*
2. Is hazardous waste treated ☐, burned ☐, land filled ☐, put in surface impoundments ☐ or waste piles ☐? No ☐ (stop) Yes ☐
   ☞ If yes, is the facility permitted for above described activity? Yes ☐ No ☐ → *Forward to RCRA*
3. Did you see or does the facility have any large quantities of materials that the facility claims to be non-hazardous waste material (>10 drums, roll-offs, waste piles, etc. – exclude clean office trash, cardboard, & packaging type wastes)? No ☐ (stop) Yes ☐

Material Claimed To Be Non-Hazardous	How does the facility know these wastes are non-hazardous?
_____	Testing, industry or manuf. info.., MSDS, etc. ☐; None available ☐ → *Forward to RCRA*
_____	Testing, industry or manuf. info.., MSDS, etc. ☐; None available ☐ → *Forward to RCRA*
_____	Testing, industry or manuf. info.., MSDS, etc. ☐; None available ☐ → *Forward to RCRA*
_____	Testing, industry or manuf. info.., MSDS, etc. ☐; None available ☐ → *Forward to RCRA*
_____	Testing, industry or manuf. info.., MSDS, etc. ☐; None available ☐ → *Forward to RCRA*

4. Did you see any leaking hazardous waste containers, drums, or tanks? No ☐ Yes ☐ → *Forward to RCRA*
   Describe: _____ *(Get Photo)*
5. Did you see any signs of spills or releases (e.g., dead or stressed vegetation, stains, discoloration)? No ☐ Yes ☐ → *Forward to RCRA*
   Describe: _____ *(Get Photo)*
6. Did you see any chemical or waste handling practices that concern you (access to children/public)? No ☐ Yes ☐ → *Forward to RCRA*
   Describe: _____ *(Get Photo)*
7. Does the facility have any past or present underground petroleum product or hazardous material tanks? No ☐ Yes ☐ → *Forward to UST*
8. Does the facility have any underground fuel tanks for emergency generators? No ☐ Yes ☐ → *Forward to UST*

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN (SPCC)

1. Does the facility have any aboveground oil tanks (petroleum, synthetic, animal, fish, vegetable), with an aggregate volume > 1320 gallons?
   No ☒ (stop) Yes ☐ - Does the facility have a certified SPCC Plan? Yes ☐ No ☐ → *Forward to SPCC*
   ☞ If yes, are there secondary containment systems for the tanks? Yes ☐ No ☐ → *Forward to SPCC*
   ☞ If yes, are any tanks leaking where oil could reach waters of the State or U.S.? No ☐ Yes ☐ *(Get Photo)* → *Forward to SPCC*

** PLEASE TAKE PHOTOS TO DOCUMENT POTENTIAL PROBLEMS*

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
CONFIDENTIALITY NOTICE

Facility Name	
ALTER METAL CO	
Facility Address	
640 SCHMIDT RD DAVENPORT, IA 52802	
Inspector (print)	
GLENN CHERNY	
U.S. EPA, Region VII, 901 N. 5th St., Kansas City, KS 66101	Date 12-1-04

The United States Environmental Protection Agency (EPA) is obligated, under the Freedom of Information Act, to release information collected during inspections to persons who submit requests for that information. The Freedom of Information Act does, however, have provisions that allow EPA to withhold certain confidential business information from public disclosure. To claim protection for information gathered during this inspection you must request that the information be held CONFIDENTIAL and substantiate your claim in writing by demonstrating that the information meets the requirements in 40 CFR 2, Subpart B. The following criteria in Subpart B must be met:

1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.

2. No statute specifically requires disclosure of the information.

3. Disclosure of the information would cause substantial harm to your company's competitive position.

Information that you claim confidential will be held as such pending a determination of applicability by EPA.

I have received this Notice and DO NOT want to make a claim of confidentiality at this time.	
Facility Representative Provided Notice (print)	Signature/Date
CHRIS MOREHOUSE (FOR ALTER SCRAP PROCESS)	12/1/04

I have received this Notice and DO want to make a claim of confidentiality.	
Facility Representative Provided Notice (print)	Signature/Date

Information for which confidential treatment is requested;

(Rev: 11/15/99)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RECEIPT FOR DOCUMENTS AND SAMPLES

Facility Name
ALTER METAL CO
Facility Address
640 SCHMIDT RD DAVENPORT, IA 52802

Documents Collected? YES ✓ (list below) NO___

Samples Collected? YES___ (list below) NO ✓ Split Samples: YES___ NO___

Documents/Samples were: 1)Received no charge___ 2)Borrowed___ 3)Purchased___

Amount Paid: $_____ Method: Cash___ Voucher___ To Be Billed___

The documents and samples described below were collected in connection with the administration and enforcement of the applicable statute under which the information is obtained.

==========

Receipt for the document(s) and/or sample(s) described below is hereby acknowledged:

MSDS - SAFETY-KLEEN 105 SOLVENT 12 Pgs
PURCHASE ORDER - SAFETY-KLEEN SOLVENT 1 Pg
USED OIL MANIFEST DATED 6-2-04 1 Pg
PLAN OF ACTION DATED 7-2-03 8 Pgs

Facility Representative (print) (FOR ALTER) CHRIS MOREHOUSE	Signature/Date 12-1-04
Inspector (print) GLENN CHERNEY	Signature/Date 12-1-04
U.S. EPA, Region VII, 901 N. 5th Street, Kansas City, KS 66101	

(rev:1/20/93)

safety-kleen

One Brinckman Way
ELGIN, ILLINOIS 60123-7857

OIL RECOVERY PLACEMENT FORM

FOR SERVICE CALL	BRANCH MANAGER	REFERENCE NUMBER
563-386-3024	DOUG LIEBE	P0010744S2

DUNS NO. 05106-0408 FED. ID NO. 39-6090019

NAME	TITLE	SIGN
1.		
2.		

GENERATOR SHIPPER/LOCATION

NAME: Allied Scrap
INFORMATION / ATTENTION LINE:
DELIVERY ADDRESS: 235 E Rockingham Rd
CITY: Davenport STATE: IA
ZIP: 52802

BILL TO: (IF DIFFERENT FROM LOCATION)

NAME:
INFORMATION / ATTENTION LINE:
DELIVERY ADDRESS:
CITY: STATE:
ZIP:

LOCATION				
		504701		
BUSINESS TYPE	CHAIN	OUTER COUNTY	SVC. P/C	PROD. P/C
07			720	
TERRITORY	CREDIT CODE	TAX EXEMPTION NO.		

SERVICE DATE	SALES REP NO.	CUSTOMER P.O. NUMBER	CUSTOMER PHONE #	TAX CODE	HANDLING CODE		ASSOC. CODE	SERVICE TAX	C.O.M.S. TAX	PRODUCT TAX
6.2.04	2649		(563)328-3679							

	DEPT	SERVICE/ PRODUCT		UNIT PRICE	QUANTITY	CHARGE	SALES TAX	TOTAL CHARGE	CHLORINE TEST RESULTS: HALOGEN TESTER PASS	HALOGEN TESTER FAIL	CHLOR-D-TECT RESULTS (PPM)	CHLOR-D-TECT TESTERS INITIALS	SK DOT NUMBER	CC	SERVICE TERM	CHANGE SERVICE TERM (WEEKS)(INITIAL)	CHANGE SCH. DATE (YY-WW)	PROMO NO.	RELEASE NO.
1	00	66673		.16/gal	pe port	900	(144.00)	0	(144.00)	X			BM	650						
2																				
3																				
4																				
	TOTAL-SERVICE/PRODUCTS					900	—	—	(144.00)	TANK CAPACITY										

GENERATOR STATUS: CHECK ONLY ONE BOX BELOW

GENERATOR: HAZARDOUS WASTE CLASSIFICATION *	VEHICLE FLUIDS ONLY	OTHER NON-VEHICLE FLUIDS
CESQG	☐ 1	☐ 3
SQG/LQG	☒ 2	☐ 4

1 NO PREQUAL REQUIRED, NO HALOGEN TEST
2 NO PREQUAL REQUIRED, HALOGEN TEST AT PICK-UP
3 PREQUAL REQUIRED, NO HALOGEN TEST
4 PREQUAL REQUIRED, HALOGEN TEST AT PICK-UP
* REFER TO REVERSE SIDE FOR DEFINITIONS

MANIFEST NO.	USEPA TRANSPORTER ID NO.
	TXR000050930
GENERATOR USEPA ID NO.	GENERATOR STATE ID NO.

TRANSPORTER DATE 06 / 22 / 04
Brian McCumsey — PRINT NAME
X Brian McCumsey — SIGNATURE

FACILITY DATE / /
PRINT NAME
X SIGNATURE

11. US DOT DESCRIPTION (INCLUDING PROPER SHIPPING NAME, HAZARD CLASS, AND ID.)	12. CONTAINERS NO.	12. CONTAINERS TYPE	13. TOTAL QUANTITY	14. UNIT WT/VOL	SK DOT NUMBER
USED OIL (NOT USDOT HAZARDOUS MATERIAL)	001	TT	00900	G	650
USED OIL AND WATER MIXTURE (NOT USDOT HAZARDOUS MATERIAL)	0	—	0	—	927
USED ANTIFREEZE (NOT USEPA OR USDOT REGULATED)	0	—	0	—	1176

WE CARE

INTERMEDIATE FACILITY NAME AND ADDRESS: 2535 West 73rd Street SAFETY-KLEEN SYSTEMS, INC. Davenport, Iowa 52804
USA EPA ID NO. TXD098022792
STATE ID NO.

ATTACHMENT # Page 1 of

CASH ☐	TOTAL RECEIVED	APPLY PAYMENT TO:
CHECK NUMBER		☐ TODAY'S SERVICE/SALE ☐ PREVIOUS BALANCE AS FOLLOWS

INVOICE #	AMOUNT $	INVOICE #	AMOUNT $

PREVIOUS CREDIT CARD NO

CREDIT CARD NO. AMEX VISA MC EXP. DATE

CUSTOMER REFERENCE INFORMATION

MANIFEST CODE	SEQ #
	48 D

IN THE EVENT OF AN EMERGENCY CALL 1-800-468-1760 (24 hours)

CHARGE MY ACCOUNT FOR THIS TRANSACTION UNLESS OTHERWISE INDICATED IN THE PAYMENT RECEIVED SECTION.

Customer certifies that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the U.S. Environmental Protection Agency and the U.S. Department of Transportation.

ADDITIONAL TERMS AND CONDITIONS ON THE REVERSE SIDE OF THIS DOCUMENT ARE INCORPORATED HEREWITH MADE A PART HEREOF.

Print Name
X
GENERATOR/SHIPPER DESIGNATED REPRESENTATIVE/SIGNATURE

SEE REVERSE SIDE FOR IMPORTANT INFORMATION

TOTAL DUE $ 144.00

DO NOT WRITE IN THIS SPACE BELOW

P0010744S2

002699

CUSTOMER

PART NO. 1361 (Rev 9/97)

BRANCH 304701 CSG 16 RAGONA,PAUL 11/02/04 10:25 PAGE 1

Safety-Kleen
5400 Legacy Dr.
Cluster II, Building 3
Plano, Texas 75024
563-386-3024

Purchase Order

REFERENCE NBR 0027443176

CUSTOMER# 223123 ALTER SCRAP PROCESSINGION
SERVICE TAX: 0.07000 2351 ROCKINGHAM RD
COMS TAX: 0.07000
PRODUCT TAX: 0.07000 DAVENPORT IA 52808
PHONE 319 328 3663
PURCHASE ORDER# 13591 TAX EXEMPTION NBR:

SRVC WEEK: 04-44
SRVC DATE: 11/02/04 10:24

PRODUCT/SERVICES

SERVICE/ PRODUCT SERIAL#		QTY	UNIT PRICE	TAX	TOTAL CHARGE
100001	TEMPORARY FUEL SURCHARGE	1	7.1500	0.00	7.15
30300	MODEL 30 W/105 RECYCLED	1	134.4000	9.41	143.81
30246137	CLEAN 17 SPENT 14 SERVICE TERM 4				
	TOTAL SERVICE/PRODUCTS		141.5500	9.41	150.96

USEPA TRANSPORTER 1 TXR000050930 GENERATOR USEPA
USEPA TRANSPORTER 2 GENERATOR STATE
FORM CODE DP

US DOT DESCRIPTION (INCLUDING PROPER SHIPPING NAME, HAZARD CLASS, AND ID
WASTE COMBUSTIBLE LIQUID, N.O.S.
(PETROLEUM NAPHTHA) NA1993 PGIII RQ
(D001)ERG#128 (6.7#/GL)(D018,D039,D040)
TOTAL CONT 1 TYPE DM TTL QTY 14 UNIT WT/VOL G SKDOT 801
CONTAINER# 41009048724 QTY 14

DESIGNATED FACILITY NAME/ADDRESS:
SAFETY-KLEEN SYSTEMS, INC.
3035 WEST 73RD STREET
DAVENPORT, IA 52806

USEPA ID NO IAD098027592
STATE ID NO

TOTAL CHARGE 150.96
WASTE MIN 0.00
TOTAL DUE 150.96

NOV 24 2004
UNPAID BALANCE THIS RECEIPT 150.96

Machine clean and good condition? Yes
Decals in place and legible? Yes
Fusible link installed? Yes
Emergency closing of lid unobstructed? Yes
Machine properly grounded? Yes
Spent solvent meets acceptance criteria? Yes

GENERATOR STATUS 0 - 220 lbs/month

Customer certifies that (i) the above named materials are properly classified, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and (ii) no material change has occurred either in the characteristics of the waste materials or in the process generating the waste materials. Customer agrees to pay the above charges and to be bound by the terms and conditions (1) set forth in (a) the General Terms and Conditions provided separately to Customer or (b) any SK agreement signed by Customer and SK, and (2) incorporated herein by reference. Unless otherwise indicated in the payment received section, SK is authorized to charge Customer's account for this transaction. Customer certifies that the individual signing this Service Acknowledgement is duly authorized to sign and bind Customer.
IN THE EVENT OF AN EMERGENCY CALL 1-800-468-1760 (24 hours)

larry twigg
SIGNATURE NAME: larry twigg

LAST PAGE

PURCHASE ORDER NO. 13591
ORDER DATE 11/2/04
TERMS
F.O.B.
SHIPPED VIA

SHIPPED TO:

ACCT. NO. 01-02-511-7152
EQUIP. NO.
APPROVED
PAY DATE

	UNIT PRICE	AMOUNT
		150.96
	TOTAL	

ATTACHMENT 5 Page 1 of 1

APPROVED BY

DATE 11/2/04

SAFETY-KLEEN 105 SOLVENT RECYCLED
MATERIAL SAFETY DATA SHEET FOR USA AND CANADA

SECTION 1: PRODUCT AND COMPANY IDENTIFICATION

PRODUCT NAME: **SAFETY-KLEEN 105 SOLVENT RECYCLED**

SYNONYMS: Parts Washer Solvent; Petroleum Distillates; Petroleum Naphtha; Naphtha, Solvent; Stoddard Solvent; Mineral Spirits.

PRODUCT CODE: 6614, 6617, 1011662, 1014662

PRODUCT USE: Cleaning and degreasing metal parts.
If this product is used in combination with other products, refer to the Material Safety Data Sheet for those products.

24-HOUR EMERGENCY PHONE NUMBERS

These numbers are for emergency use only. If you desire non-emergency product information, please call a phone number listed below.

MEDICAL: **1-800-752-7869**

TRANSPORTATION (SPILL): **1-800-468-1760**

SUPPLIER:
Safety-Kleen Systems, Inc.
5400 Legacy Drive
Cluster II, Building 3
Plano, Texas 75024
USA
1-800-669-5740
www.Safety-Kleen.com

TECHNICAL INFORMATION: **1-800-669-5740 Press 1 then Enter 7500**

MSDS FORM NUMBER: 82310

ISSUE: April 20, 2004

ORIGINAL ISSUE: April 8, 1976

SUPERSEDES: March 16, 2004

PREPARED BY: Product MSDS Coordinator

APPROVED BY: MSDS Task Force

SECTION 2: COMPOSITION/INFORMATION ON INGREDIENTS

WT%	NAME	SYNONYM	CAS NO.	OSHA PEL** TWA	OSHA PEL** STEL	ACGIH TLV® TWA	ACGIH TLV® STEL	LD[a]	LC[b]
				ppm	ppm	ppm			
99-100	Distillates (petroleum), hydrotreated light	N. Av.	64742-47-8	500[c] ppm 2900[c] mg/m³	N. Av.	100[c]	N. Av.	5000[c] mg/kg	5500[c] mg/m3/4h
0-0.2*	Tetrachloroethylene	Perchloroethylene; Tetrachloroethene	127-18-4	100 ppm	200 (ceiling)	25	100	2629	34.2 g/m³/8h

**OSHA Final PEL value (enforceable). Some States have adopted more stringent values.

N. Av. = Not Available
* Even though the concentration range does not fall under the ranges prescribed by WHMIS, this is the actual range which varies with each batch of the product.

[a]Oral-Rat LD_{50}
[b]Inhalation-Rat LC_{50}

[c]Based on Stoddard Solvent

SECTION 3: HAZARDS IDENTIFICATION

EMERGENCY OVERVIEW

APPEARANCE
Liquid, clear and green, mild hydrocarbon odor.

WARNING!

PHYSICAL HAZARDS
Combustible liquid and vapor.

HEALTH HAZARDS
May be harmful if inhaled.
May irritate the respiratory tract (nose, throat, and lungs), eyes, and skin.
May be harmful if swallowed.
Contains material that may cause central nervous system and kidney damage.
Contains material which may cause birth defects.
Suspect cancer hazard. Contains material (less than 0.2% by weight) which may cause cancer. Risk of cancer depends on duration and level of exposure.

ENVIRONMENTAL HAZARDS
Toxic to fish.

POTENTIAL HEALTH EFFECTS

INHALATION (BREATHING): High concentrations of vapor may be harmful if inhaled. High concentrations of vapor or mist may irritate the respiratory tract (nose, throat, and lungs). High concentrations of vapor or mist may cause nausea, vomiting, headaches, dizziness, loss of coordination, numbness, and other central nervous system effects. Massive acute overexposure may cause rapid central nervous system depression, sudden collapse, coma, and/or death.

EYES: May cause irritation.

SKIN: May cause irritation. Not likely to be absorbed in harmful amounts.

INGESTION (SWALLOWING): May be harmful if swallowed. May cause throat irritation, nausea, vomiting, and diarrhea. Breathing product into the lungs during ingestion or vomiting may cause lung injury and possible death.

MEDICAL CONDITIONS AGGRAVATED BY EXPOSURE: Individuals with pre-existing respiratory tract (nose, throat, and lungs), central nervous system, kidney, eye, and/or skin disorders may have increased susceptibility to the effects of exposure.

CHRONIC: Prolonged or repeated inhalation may cause toxic effects as noted under **INHALATION (BREATHING)**. Prolonged or repeated exposure may cause central nervous system and kidney damage or have mutagenic effects. Prolonged or repeated eye contact may cause inflammation of the membrane lining the eyelids and covering the eyeball (conjunctivitis). Prolonged or repeated skin contact may cause drying, cracking, redness, itching, and/or swelling (dermatitis). Contains material which may cause birth defects.

CANCER INFORMATION: This product contains tetrachloroethylene which may cause cancer. Risk of cancer depends on duration and level of exposure.. For more information, see **SECTION 11: CARCINOGENICITY**.

Also see **SECTION 15: CALIFORNIA**.

POTENTIAL ENVIRONMENTAL EFFECTS

Product is toxic to fish. Also see **SECTION 12: ECOLOGICAL INFORMATION**.

SECTION 4: FIRST AID MEASURES

INHALATION (BREATHING): Remove to fresh air. If not breathing, give artificial respiration. If breathing is difficult, give oxygen. Oxygen should only be administered by qualified personnel. Someone should stay with victim. Get medical attention if breathing difficulty persists.

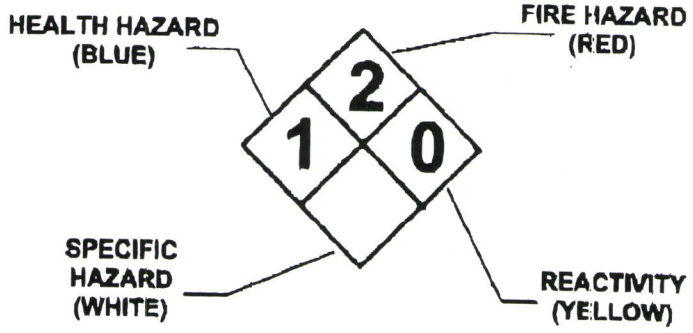
EYES:	If irritation or redness from exposure to vapor develops, move away from exposure into fresh air. Upon contact, immediately flush eyes with plenty of lukewarm water, holding eyelids apart, for 15 minutes. Get medical attention.
SKIN:	Remove affected clothing and shoes. Wash skin thoroughly with soap and water. Get medical attention if irritation or pain develops or persists.
INGESTION (SWALLOWING):	Do NOT induce vomiting. Immediately get medical attention. Call 1-800-752-7869 for additional information. If spontaneous vomiting occurs, keep head below hips to avoid breathing the product into the lungs. Never give anything by mouth to an unconscious person.
NOTE TO PHYSICIANS:	Treat symptomatically and supportively. Treatment may vary with condition of victim and specifics of incident. Call 1-800-752-7869 for additional information.

SECTION 5: FIRE FIGHTING MEASURES

FLASH POINT:	105°F (40°C) Tag Closed Cup	
FLAMMABLE LIMITS IN AIR:	**LOWER:** 0.7 VOL% (minimum)	**UPPER:** 5 VOL% (maximum)
AUTOIGNITION TEMPERATURE:	410°F (210°C) (minimum)	
HAZARDOUS COMBUSTION PRODUCTS:	Decomposition and combustion materials may be toxic. Burning may produce carbon monoxide and unidentified organic compounds.	
CONDITIONS OF FLAMMABILITY:	Heat, sparks, or flame.	
EXTINGUISHING MEDIA:	Carbon dioxide, regular foam, dry chemical, water spray, or water fog.	

NFPA 704
HAZARD IDENTIFICATION:

This information is intended solely for the use by individuals trained in this system.



FIRE FIGHTING INSTRUCTIONS:

Keep storage containers cool with water spray. A positive-pressure, self-contained breathing apparatus (SCBA) and full-body protective equipment are required for fire emergencies.

FIRE AND EXPLOSION HAZARDS:

Vapor explosion hazard indoors, outdoors, or in sewers. Vapors may travel to ignition source and flashback. Vapors will spread along the ground and collect in low or confined areas. Run-off to sewer may create a fire hazard. Heated containers may rupture or be thrown into the air. "Empty" containers may retain residue and can be dangerous. Product is not sensitive to mechanical impact or static discharge.

SECTION 6: ACCIDENTAL RELEASE MEASURES

Remove all ignition sources. Do not touch or walk through spilled product. Stop leak if you can do it without risk. Wear protective equipment and provide engineering controls as specified in **SECTION 8: EXPOSURE CONTROLS/PERSONAL PROTECTION**. Isolate hazard area. Keep unnecessary and unprotected personnel from entering. Ventilate area and avoid breathing vapor or mist. A vapor suppressing foam may be used to reduce vapors. Contain spill away from surface water and sewers. Contain spill as a liquid for possible recovery, or sorb with compatible sorbent material and shovel with a clean, sparkproof tool into a sealable container for disposal.

Additionally, for large spills: Water spray may reduce vapor, but may not prevent ignition in closed spaces. Dike far ahead of liquid spill for collection and later disposal.

There may be specific federal regulatory reporting requirements associated with spills, leaks, or releases of this product. Also see **SECTION 15: REGULATORY INFORMATION.**

SECTION 7: HANDLING AND STORAGE

HANDLING: Keep away from heat, sparks, or flame. Where flammable mixtures may be present, equipment safe for such locations should be used. Use clean, sparkproof tools and explosion-proof equipment. When transferring product, metal containers, including trucks and tank cars, should be grounded and bonded. Do not breathe vapor or mist. Use in a well ventilated area. Avoid contact with eyes, skin, clothing, and shoes. Do not smoke while using this product.

SHIPPING AND STORING: Keep container tightly closed when not in use and during transport. Store containers in a cool, dry place. Do not pressurize, cut, weld, braze, solder, drill, or grind containers. Keep containers away from heat, flame, sparks, static electricity, or other sources of ignition. Empty product containers may retain product residue and can be dangerous. See **SECTION 14: TRANSPORTATION INFORMATION** for Packing Group information.

SECTION 8: EXPOSURE CONTROLS/PERSONAL PROTECTION

ENGINEERING CONTROLS: Provide general ventilation needed to maintain concentration of vapor or mist below applicable exposure limits. Where adequate general ventilation is unavailable, use process enclosures, local exhaust ventilation, or other engineering controls to control airborne levels below applicable exposure limits. Where explosive mixtures may be present, equipment safe for such locations should be used.

PERSONAL PROTECTIVE EQUIPMENT

RESPIRATORY PROTECTION: Use NIOSH-certified P- or R- series particulate filter and organic vapor cartridges when concentration of vapor or mist exceeds applicable exposure limits. Protection provided by air purifying respirators is limited. Do not use N-rated respirators. Selection and use of respiratory protective equipment should be in accordance in the USA with OSHA General Industry Standard 29 CFR 1910.134; or in Canada with CSA Standard Z94.4.

EYE PROTECTION: Where eye contact is likely, wear chemical goggles; contact lens use is not recommended.

SKIN PROTECTION:	Where skin contact is likely, wear laminate (Ansell Edmont Barrier®, North Silver Shield®, Safety 4 4h®) or equivalent protective gloves; use of natural rubber (latex), polyvinyl chloride (PVC) or equivalent gloves is not recommended. To avoid prolonged or repeated contact with product where spills and splashes are likely, wear appropriate chemical-resistant faceshield, boots, apron, coveralls, long sleeve shirts, or other protective clothing.
PERSONAL HYGIENE:	Use good personal hygiene. Wash thoroughly with soap and water after handling product and before eating, drinking, or using tobacco products. Clean affected clothing, shoes, and protective equipment before reuse. Discard affected clothing, shoes, and/or protective equipment if they cannot be thoroughly cleaned. Discard leather articles, such as shoes, saturated with this product.
OTHER PROTECTIVE EQUIPMENT:	Where spills and splashes are likely, facilities storing or using this product should be equipped with an emergency eyewash and shower, both equipped with clean water, in the immediate work area.

SECTION 9: PHYSICAL AND CHEMICAL PROPERTIES

PHYSICAL STATE, APPEARANCE, AND ODOR:	Liquid, clear and green, mild hydrocarbon odor.
ODOR THRESHOLD:	30 ppm (based on Stoddard Solvent)
MOLECULAR WEIGHT:	Not available.
SPECIFIC GRAVITY:	0.77 to 0.80 at 60°F (15.6°C) (water = 1)
DENSITY:	6.4 to 6.7 LB/US gal (770 to 800 g/l)
VAPOR DENSITY:	5 (air = 1) (approximately)
VAPOR PRESSURE:	0.4 mm Hg at 68°F (20°C) (approximately) 1.0 mm Hg at 100°F (37°C) (approximately)
BOILING POINT:	310°F (155°C) (initial)
FREEZING/MELTING POINT:	-45°F (-43°C) (maximum)
pH:	Not applicable.
EVAPORATION RATE:	0.1 (butyl acetate = 1) (based on Stoddard Solvent)

SOLUBILITY IN WATER:	Insoluble.
FLASH POINT:	105°F (40°C) Tag Closed Cup
FLAMMABLE LIMITS IN AIR:	**LOWER:** 0.7 VOL% (minimum) **UPPER:** 5 VOL% (maximum)
AUTOIGNITION TEMPERATURE:	410°F (210°C) (minimum)

SECTION 10: STABILITY AND REACTIVITY

STABILITY:	Stable under normal temperatures and pressures. Avoid heat, sparks, or flame.
INCOMPATIBILITY:	Avoid acids, alkalies, oxidizing agents, reducing agents, reactive metals or reactive halogens.
REACTIVITY:	Polymerization is not known to occur under normal temperature and pressures. Not reactive with water.
HAZARDOUS DECOMPOSITION PRODUCTS:	None under normal temperatures and pressures. See also **SECTION 5: HAZARDOUS COMBUSTION PRODUCTS**.

SECTION 11: TOXICOLOGICAL INFORMATION

SENSITIZATION:	Based on best current information, there is no known human sensitization associated with this product.
MUTAGENICITY:	Tetrachloroethylene has demonstrated human effects of mutagenicity. Based on best current information, the other component listed in **SECTION 2** is not a mutagen.

CARCINOGENICITY: Tetrachloroethylene is categorized by IARC as probably carcinogenic to humans (Group 2A). Tetrachloroethylene is listed by NTP as having sufficient evidence of carcinogenicity in experimental animals, but is not known or reasonably anticipated to be a human carcinogen according to NTP. Tetrachloroethylene is categorized by ACGIH as a confirmed animal carcinogen with unknown relevance to humans (A3).

Also see **SECTION 3: CANCER INFORMATION** and **SECTION 15: CALIFORNIA**.

REPRODUCTIVE TOXICITY: Based on best current information, there is no known reproductive toxicity associated with this product.

Also see **SECTION 15: CALIFORNIA**.

TERATOGENICITY: Tetrachloroethylene has demonstrated animal effects of teratogenicity.

Based on best current information, the other component listed in **SECTION 2** is not a teratogen.

TOXICOLOGICALLY SYNERGISTIC PRODUCT(S): Based on best current information, there are no known toxicologically synergistic products associated with this product.

SECTION 12: ECOLOGICAL INFORMATION

ECOTOXICITY: 2.9 mg/L 96 hour LC_{50} Rainbow trout, Donaldson trout (Oncorhynchus mykiss) (based on Petroleum distillates, hydrotreated light).

Component Analysis - Ecotoxicity - Aquatic Toxicity

Perchloroethylene (127-18-4)

Test & Species		Conditions
96 Hr LC50 rainbow trout	5.28 mg/L	Static
96 Hr LC50 fathead minnow	13.4 mg/L	flow-through
96 Hr LC50 bluegill	12.9 mg/L	Static

OCTANOL/WATER PARTITION COEFFICIENT: Not available.

VOLATILE ORGANIC COMPOUNDS: 100 WT%; 6.4 to 6.7 LB/US gal; 770 to 800 g/l
As per 40 CFR Part 51.100(s).

SECTION 13: DISPOSAL CONSIDERATIONS

DISPOSAL: Dispose in accordance with federal, state, provincial, and local regulations. Regulations may also apply to empty containers. The responsibility for proper waste disposal lies with the owner of the waste. Contact Safety-Kleen regarding proper recycling or disposal.

USEPA WASTE CODE(S): D001, D019, D039 and D040
Based on available data, this information applies to the product as supplied to the user. Processing, use, or contamination by the user may change the waste code applicable to the disposal of this product.

SECTION 14: TRANSPORT INFORMATION

DOT:

Bulk Packages (>119 Gallons):
Shipping Name: Combustible liquid, n.o.s. (petroleum naphtha) **UN/NA #:** NA1993. **Hazard Class:** Combustible liquid. **Packing Group:** III **Required Placards:** Class 3, NA1993

*See 49 CFR 173.150(f)(1-4)

Non-bulk Packages (<120 Gallons) (shipments via vessel and aircraft must use bulk package shipping description):
Shipping Name: Cleaning compounds (Petroleum naphtha) (Not US DOT regulated). **UN/NA #:** None. **Hazard Class:** None **Packing Group:** None **Required Label(s):** None

TDG:

Large Means of Containment:
Shipping Name: PETROLEUM DISTILLATES, N.O.S. (petroleum naphtha).**UN/NA #:** UN1268 **Hazard Class:** 3 **Packing Group:** III **Required Placards:** Class 3, UN1268

*See TDGR 1.33

Small Means of Containment (shipments via aircraft must use large means of containment shipping description) :
Shipping Name: CLEANING COMPOUNDS (petroleum naphtha) (Not TDG regulated).**UN/NA #:** None **Hazard Class:** None **Packing Group:** None **Required Label(s):** None

EMERGENCY RESPONSE GUIDE NUMBER: 128
Reference *North American Emergency Response Guidebook*

SECTION 15: REGULATORY INFORMATION

USA REGULATIONS

SARA SECTIONS Based on the ingredients listed in **SECTION 2**, this product does not

302 AND 304: contain any "extremely hazardous substances" listed pursuant to Title III of the Superfund Amendments and Reauthorization Act of 1986 (SARA) Section 302 or Section 304 as identified in 40 CFR Part 355, Appendix A and B.

SARA SECTIONS 311 AND 312: This product poses the following health hazards as defined in 40 CFR Part 370 and is subject to the requirements of sections 311 and 312 of Title III of the Superfund Amendments and Reauthorization Act of 1986 (SARA):

Immediate (Acute) Health Hazard
Delayed (Chronic) Health Hazard
Fire Hazard

SARA SECTION 313: This product does contain a "toxic" chemical subject to the requirements of section 313 of Title III of the Superfund Amendments and Reauthorization Act of 1986 (SARA) and 40 CFR Part 372.

Material	CAS
Perchloroethylene	127-18-4

CERCLA: Based on the ingredients listed in **SECTION 2**, this product contains the following "hazardous substance" listed under the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA) in 40 CFR Part 302, Table 302.4 with the following reportable quantities (RQ):

Material	CAS	RQ
Perchloroethylene	127-18-4	100 lb (45.4 kg)

TSCA: All the components of this product are listed on, or are automatically included as "naturally occurring chemical substances" on, or are exempted from the requirement to be listed on, the TSCA Inventory.

CALIFORNIA: This product may contain a detectable amount of benzene CAS 71-43-2, p-dichlorobenzene CAS 106-46-7, methylene chloride CAS 75-09-2, perchloroethylene CAS 127-18-2 and trichloroethylene CAS 79-01-6. WARNING: These chemicals are known to the State of California to cause cancer.

This product may contain a detectable amount of benzene CAS 71-43-2 and toluene CAS 108-88-3. WARNING: These chemicals are known to the State of California to cause birth defects or other reproductive harm.

CANADIAN REGULATIONS

This product has been classified in accordance with the hazard criteria of the Controlled Products Regulations (CPR) and the MSDS contains all information required by the CPR.

WHMIS: Class B3 - Combustible Liquid

Class D2B - Irritating to eyes and skin.
Class D2A - Contains component that may cause cancer.

CANADIAN ENVIRONMENTAL PROTECTION ACT (CEPA): All the components of this product are listed on, or are automatically included as "substance occurring in nature" on, or are exempted from the requirements to be listed on, the Canadian Domestic Substances List (DSL).

SECTION 16. OTHER INFORMATION

REVISION INFORMATION: This MSDS has been revised in the following sections:
Section 14: Change in transportation

LABEL/OTHER INFORMATION: This product is United States Department of Agriculture (USDA) approved, ETL classified and Factory Mutual (FM) approved.

Fields of Opportunities

STATE OF IOWA

THOMAS J. VILSACK, GOVERNOR
SALLY J. PEDERSON, LT. GOVERNOR

DEPARTMENT OF NATURAL RESOURCES
JEFFREY R. VONK, DIRECTOR

March 20, 2003

Chris Morehouse, Yard Manager
Alter Scrap Processing
640 Schmidt Rd.
Davenport, IA 52802

Notice of Violation: Contaminants in Shredder Fluff, Subrule 567-IAC-118.14(1)

Subject: Appliance Demanufacturing Facility Inspection
Facility No: -Pending-

Dear Mr. Morehouse:

We have enclosed one copy of an inspection report of Alter's appliance demanufacturing facility, prepared by Shane Dodge of this office. We believe you will find the inspection report to be self-explanatory.

Please note the summary of requirements listed at the end of the report. Detailed comments on each of the items noted can be found earlier in the report. All these deficiencies must be addressed in order to obtain an appliance demanufacturing permit from this department. Mr. Dodge plans to conduct a follow-up inspection on **3-26-2003**.

We are particularly concerned about the levels of PCB and metals that Mr. Dodge discovered in your shredder fluff. As you are well aware, we have required Alter's to immediately cease disposal of the Davenport facility shredder fluff within the State of Iowa.

In order to resume disposal in Iowa, we are requiring that you prepare a "plan of action" for this office. The plan must detail how fluff will be sampled and managed to ensure the PCB's and the lead and mercury TCLP are kept below regulatory limits.

The plan must include a sampling protocol that will provide representative sampling of the fluff and an updated source control program to further reduce prohibited materials from entering the waste stream.

The plan of action must be submitted to this office by 3-31-03.

Environmental Services Division, Field Office #6, 1004 W. Madison, Washington, Iowa 52353 Tel 319-653-2135 . Fax 319-653-2856
WALLACE STATE OFFICE BUILDING / DES MOINES, IOWA 50319
515-281-5918 TDD 515-242-5967 FAX 515-281-6794 www.state.ia.us/dnr

If there are any questions concerning the report or this letter, feel free to contact this office.

Sincerely,

FIELD SERVICES & COMPLIANCE BUREAU

Dennis Ostwinkle
Field Office Supervisor

DO:j:\adp-alter0303.ltr

Encl. Inspection Report
Sample Results

xc: Jim Thayer, Solid Waste Section, DNR, Des Moines
Keith Krambeck, Scott Area Landfill, P.O. Box 563, Buffalo, IA 52728
Steve Pollard, EPA Region VII, ARTD/RESP, 901 N. 5th. St., Kansas City, KS 66101
David Phillippi, EPA Region VII, ARTD/RALI, 901 N. 5th. St., Kansas City, KS 66101
File

Suspense **3-26-2003 and 3-31-2003**

IOWA DEPARTMENT OF NATURAL RESOURCES
APPLIANCE DEMANUFACTURING PERMIT INSPECTION

Permit No.: Pending	**County:** Scott
Facility Name: Alter Scrap Processing **Phone Number:** (563) 328-3606	**Facility Address:** 640 Schmidt Road Davenport, IA 52802
Responsible Official: Chris Morehouse, Yard Manager **Phone Number:** (563) 328-3606	**Mailing Address:** Same
Date of Last Inspection: N/A	**Date of This Inspection:** 2-20-03

GENERAL INFORMATION:

Kurt Levetzow and I from DNR Field Office #6 conducted this Appliance Demanufacturing Permit (ADP) inspection at the Davenport, Iowa processing facility. We met with the following representatives of Alter Scrap Processing (ASP): Eric Mart, yard inspector; Lorenzo Martinez, yard supervisor; Rodney Deaton, yard manager; and Jeff Marshall, account executive.

ASP operates 15 processing facilities scattered throughout Iowa, Minnesota, Wisconsin, Illinois and Nebraska. ASP is considered on of the largest scrap processing companies in the United States.

The Davenport facility is outfitted with a shredder and shear. Both ferrous and non-ferrous metals are processed and recovered at this facility. At the time of this inspection, ASP was shredding approximately 700 tons of metal per day. Of the 700 tons, approximately 500 tons are shreddables, and 200 tons are clean steel. ASP generates approximately 110 tons of shredder fluff (i.e. non-metallic material) per day. All fluff removed from this facility is disposed of at the Scott County Landfill.

ASP has developed a source control program in an attempt to control the number of illegal appliances entering the Davenport facility. The program includes a facility specific certification process by ASP personnel, combined with random load inspections. ASP is pursuing an ADP to be able to demanufacture illegal appliances that circumvent the source control program and are observed in the general scrap storage piles.

ASP is not authorized to conduct any demanufacturing activities until an ADP issued by the DNR.

STORAGE & HANDLING OF APPLIANCES PRIOR TO DEMANUFACTURING:

Item	Yes	No	NA
1. Are appliances being stored to prevent capacitors, refrigerant lines, compressors, and components containing mercury from being damaged and allowing a release into the environment?	☐	☒	☐
2. Are appliances being handled in a way, which prevents damage, cuts, or breaks in refrigerant lines, compressors, capacitors or mercury containing components from being damaged and allowing a release into the environment?	☒	☐	☐
3. Are less than 1,000 appliances being stored prior to demanufacturing?	☒	☐	☐
4. Are appliances being stored less than 270 days without demanufacturing?	☒	☐	☐

Comments:

1. Two air conditioners with PCB capacitors were observed in a metal pile located approximately 200 feet west of the Scale Office. Mr. Mart stated that the air conditioners would be properly demanufactured and marked as soon as possible.

FIXED FACILITIES & MOBILE OPERATIONS REQUIREMENTS:

Item	Yes	No	NA
1. Is demanufacturing taking place on an impervious floor (including but not limited to concrete, ceramic tile, or metal)?	☒	☐	☐
2. Is the point of demanufacturing located 50 feet or more from a well and any water of the state?	☒	☐	☐
3. Is the point of demanufacturing located above the 100-year flood water elevation?	☒	☐	☐
4. Is a unique marking system (being a minimum of nine inches square) being applied to the appliances after demanufacturing?	☒	☐	☐
5. Is a copy of the Authorization to Discharge (Stormwater) permit number available if the facility is storing/processing appliances outside?	☒	☐	☐
6. Has the facility developed and implemented a Stormwater Pollution Prevention Plan?	☒	☐	☐

Comments:

1. ASP set up a designated demanufacturing facility in the east 1/3 of a warehouse located approximately 150 feet east of the Scale Office.

TRAINING:

Item	Yes	No	NA
1. Is at least one owner or fulltime employee completed a DNR approved training course?	☒	☐	☐
2. Is one trained person on site at all times when appliances are being demanufactured?	☒	☐	☐

Comments:

1. Chris Morehouse, Eric Mart and Jesse Torres have completed the DNR-approved training course. Mr. Mart will oversee most of the demanufacturing activities.

REFRIGERANTS:

Item	Yes	No	NA
1. Is a copy of the EPA Refrigerant Recovery or Recycling Devise Acquisition Certification available?	☒	☐	☐
2. If the facility services appliances, is a copy of the technician's Certification for Refrigerant Removal training available?	☐	☐	☒
3. Is a copy of the EPA Refrigerant Reclaimer's Certification available if reclamation is taking place at the facility?	☐	☐	☒
4. If refrigerant is removed at a location other than this facility, is there documentation for each appliance that certifies the refrigerant was removed properly?	☐	☒	☐
5. Is removal of refrigerant being done in an area where the temperature of the surrounding air and that of the appliance being demanufactured are 45 degrees Fahrenheit or greater?	☒	☐	☐
6. Are records being kept as to where refrigerants are being shipped to be reclaimed? (name of the facility to which refrigerant was shipped, date of each shipment, amount shipped, and name and address of transporter?)	☐	☒	☐
7. Are records being kept as to where refrigerants are being shipped for disposal? (name of the facility to which refrigerant was shipped, date of each shipment, amount shipped and name and address of the transporter?)	☐	☒	☐

Comments:

4. ASP will have to develop a certification process for refrigerated appliances received with their refrigerants removed at a different facility.
5. ASP plans to install a natural gas fired heater in the near future. In the interim, no refrigerant recovery can occur unless the air temperature within the demanufacturing facility is ≥ 45°F.
6. No refrigerants have been recovered to date, as ASP has not formally commissioned the demanufacturing facility.
7. See Comment 6.

COMPRESSOR OIL:

Item	Yes	No	NA
1. If compressor oil is being removed from the refrigeration units, is it being stored in accordance with 567-119.5?	☐	☐	☒

Comments:

1. ASP does not remove the oil from compressors. Be advised that oil filled compressors must be stored in such a fashion that prevents a release to the environment.

AMMONIA GAS OPERATED REFRIGERANTS AND AIR CONDITIONERS:

Item	Yes	No	NA
1. Is the ammonia gas being vented into water and is the resulting wastewater being properly disposed of?	☐	☐	☒
2. Is sodium chromate being stored in containers labeled "chromium" or "hazardous waste"?	☐	☐	☒
3. Is the start date on the container label? Storage of sodium chromate is limited to one year, after which, it must be transported to an EPA permitted facility?	☐	☐	☒
4.Are records being kept on the shipment of sodium chromate (name of the facility to which sodium chromate was shipped, the date of each shipment, the amount shipped and the name and address of the transporter)?	☐	☐	☒
5. Does the facility have an EPA ID number (RCRA)?	☐	☐	☒
6. Is asbestos insulation being removed and handled per OSHA and 40 CFR Part 61.150?	☐	☐	☒

Comments:

1. ASP will take all ammonia-gas refrigerators to the Scott County Landfill for proper demanufacturing.

MERCURY CONTAINING COMPONENTS:

Item	Yes	No	NA
1. Are mercury components being stored in containers with a label of "mercury" or "hazardous waste"?	☐	☒	☐
2. Is the start date on the container label? Storage of mercury is limited to one year, after which, it must be transported to an EPA approved recycler/recovery facility.	☐	☒	☐
3. Are fluorescent tubes, lamps, bulbs, etc., being placed in a container and packaged to prevent breakage for shipment to an EPA approved recycler?	☐	☒	☐
4. Are records being kept on the shipment of mercury components (name of the facility to which components were shipped, including fluorescent bulbs, the date of each shipment, the number of components and number of tubes shipped and the name and address of the transporter)?	☐	☒	☐

Comments:

1. The mercury storage barrels are on-site but have not been put in service.

CAPACITORS:

Item	Yes	No	NA
1. Are PCB containers labeled with a 6" by 6" yellow label stating "PCBs"?	☒	☐	☐
2. Is the date when the first capacitor was placed in the storage container on the label? Storage of capacitors is limited to 270 days after which they must be transported to an EPA approved landfill or incinerator. This burial or incineration must be documented (within one year of the date on the container) and this record kept by the demanufacturer for three years from the date the PCB waste was accepted by the initial transporter.	☐	☒	☐
3. Are PCB storage containers filled to two inches of absorbent material in the bottom?	☒	☐	☐
4. Are PCB items being stored in a manner that provides adequate protection from the elements and adequate secondary containment?	☒	☐	☐
5. If a temporary storage area for PCB capacitors is used, is the date of removal placed on each PCB item when it was removed from an appliance? Temporary storage of non-leaking PCB capacitors is limited to 30 days from the date of removal in an area that does not comply with previous requirements.	☐	☐	☒
6. Are records being kept on the shipment of PCB capacitors and ballasts (name and address of the facility that the items were shipped to, the date of the shipment, the weight of the capacitors shipped and the name and address of the transporter)?	☐	☒	☐

Comments:

2. Two active PCB barrels were observed in the demanufacturing facility. Less than 10 PCB capacitors and ballasts were in storage at the time of this inspection. The barrels were not properly dated. Mr. Mart was questioned about the source of the capacitors and ballasts. He stated that they were recently taken from appliances that ended up in the scrap piles.
6. No PCB capacitors or ballasts have been shipped offsite for disposal to date.

SPILLS:

Item	Yes	No	NA
1. Are spill records being kept and has the facility properly reported spills that resulted in a hazardous condition?	☐	☒	☐
2. Is a mercury spill kit on hand?	☒	☐	☐

Comments:

1. No spill records were observed on-site. Be advised that spills of liquid PCBs which occur outside of a DOT-approved container must be cleaned up and have the clean up verified by sampling as described in 40 Code of Federal Regulations (CFR) Part 761, §761.130.

ADDITIONAL RECORDKEEPING AND REPORTING:

Item	Yes	No	NA
1. Are records being kept as to the facility to which demanufactured appliances were shipped (name and address, date of each shipment, the weight of the appliances, and name and address of the transporter)?	☐	☒	☐
2. Are copies of annual reports (containing all the recordkeeping requirements) that have been sent to the DNR central office being retained for at least three years?	☐	☒	☐

Comments:

1. ASP will have to keep scale tickets for all appliances demanufactured.
2. ASP did not have to file an annual report for 2002.

SHREDDING:

Item	Yes	No	NA
1. Are appliances shredded on-site?	☒	☐	☐
2. Has the resulting fluff been tested (at least quarterly) for the presence of PCBs, mercury and lead? PCBs <50 ppm; Mercury <0.20 ppm; Lead <5.0 ppm	☒	☐	☐

Comments:

3. ASP conducts monthly fluff sampling as per an agreement with the Scott County Landfill. Lorenzo Martinez collects a seven-day composite sample from three waste streams each month. The three waste streams are identified as 2" Down Fluff, Recycle Cover, and Fluff. Mr. Martinez reported that their standard operating procedure is to mix all three waste streams prior to shipping it to the Scott County Landfill. A review of ASP's sample results from calendar year 2002 was conducted. High levels of lead and PCBs were observed in five samples as summarized below:

Sample No.	Sample Description	Date Collected	Parameter	Result (ppm)	Limit (ppm)
680354	Recycle Cover	6-12-02	Lead (TCLP)	5.31	5.0
688352	Fluff	7-26-02	PCB (1242)	3,035	50
697734	Fluff	9-19-02	PCB (1242,1254)	51	50
697735	2" Down Fluff	9-19-02	PCB (1242,1254)	961	50
697736	Recycle Cover	9-19-02	PCB (1242)	51	50

All three waste streams exceeded disposal limits at least once during 2002. Since it is common for ASP to mix all three waste streams prior to shipment to the landfill, the current sampling protocol does not yield representative sample results.

Grab samples of the shredder fluff were collected during this inspection and sent to the University of Iowa Hygienic Laboratory for analysis. The sample results are summarized below:

Sample No.	Sample Description	Date Collected	Parameter	Result (ppm)	Limit (ppm)
200301150	Cyclone Separator Fluff (i.e. Recycle Cover)	2-20-03	Lead (TCLP)	3.1	5.0
			PCB (1242,1254)	41.1	50
200301148	Today's Fluff (i.e. Fluff)	2-20-03	Lead (TCLP)	<0.50	5.0
			Mercury (TCLP)	<0.02	0.20
			PCB (1242,1254)	45.9	50
200301149	Fluff Storage Pile (i.e. Fluff)	2-20-03	Lead (TCLP)	0.89	5.0
			Mercury (TCLP)	<0.02	0.20
			PCB (1242,1254)	**65.4**	50

Sample No. 200301149 (Fluff Storage Pile) indicates high PCB concentrations in a portion of the fluff storage pile. When evaluating the 2002 samples and the grab samples collected during this inspection, it appears that ASP's shredder fluff has the potential of violating the applicable PCB and heavy metals standards at any given sampling event. Consequently, ASP will be prohibited from disposing of any shredder fluff (i.e. Recycle Cover, Fluff, and 2" Down Fluff) in Iowa until this office is convinced that fluff concentrations of PCBs, lead and mercury can consistently meet the limits of Subrule 567 IAC 118.14(1). The Scott County Landfill was notified of our decision on 3-18-03.

ASP must submit a Plan of Action (POA) to this office detailing how the shredder fluff will be sampled and managed in the future to ensure the concentration of PCBs, TCLP lead and mercury are below 50 ppm, 5.0 ppm and 0.20 ppm, respectively. The POA should also include changes to ASP's current source control program to further reduce the number of illegal appliances or prohibited components entering the facility. If the POA is acceptable to this office, a conditional letter of approval will be issued allowing ASP to again dispose of shredder fluff in Iowa.

Please note that a copy of this inspection report is being forwarded to the USEPA Region 7 Office in Kansas City, Kansas for further review regarding ASP's handling and storage of PCBs and hazardous waste.

REQUIREMENTS:

- Store appliances in such a fashion that prevents capacitors, ballasts, refrigerant lines, compressors, and mercury-containing components from being damaged.
- Develop a certification process for refrigerated appliances received with their refrigerants removed at a different facility.
- Place a start date on each PCB storage container.
- Immediately cease and desist all appliance demanufacturing activities until an ADP is obtained from the DNR.
- Immediately cease and desist all shredder fluff disposal within the State of Iowa until further notice.
- Submit a POA to this office detailing the corrective actions ASP will implement, including a compliance schedule, to allow future disposal of shredder fluff in Iowa by no later than 3-31-03.

This office will conduct an ADP follow up inspection at ASP on 3-26-03.

Inspector: _____ Date: 3-17-03 Reviewed By: Paul Brandt Date: 3-18-03

Hygienic Laboratory

The University of Iowa

Date of report: 03-12-2003

SHANE DODGE
EPD 6
1004 WEST MADISON

WASHINGTON IA 52353

Sample Number	**200301150**
Date Received	02-24-2003
Project	04WQFS
Date Collected	02-20-2003 10:20
Collection Site	b-18 cyclone separator
Collection Town	
Description	fluff
Reference	ALTER SCRAP
Collector	DODGE SHANE
Phone	(319) 653-2135
Purchase Order	

Comments: *Upon receipt at the UHL sample meets standard acceptance criteria EXCEPT: sample temperature exceeds 6 degrees celsius.*

Results of Analyses

TCLP Extraction

Analyte	Concentration	Method	Analyst/ Verifier	Date Analyzed
Leachate pH	6.2 pH Units	EPA 1311	PJM/LF	03-06-2003

Polychlorinated biphenyls in Solids

Analyte	Concentration mg/kg	Quantitation Limit
Aroclor 1016	<0.5	0.5
Aroclor 1221	<0.5	0.5
Aroclor 1232	<0.5	0.5
Aroclor 1242	34	0.5
Aroclor 1248	<0.5	0.5
Aroclor 1254	7.1	0.5
Aroclor 1260	<0.5	0.5

Date Analyzed: 03-04-2003
Method: EPA 8082
Date Prepared: 02-27-2003
Preparation Method: EPA 3550/3630

Analyst: VR
Verified: DLZ
Analyst: RAD
Verified: GJ

Lead in Solid Sample

Analyte	Concentration mg/kg by dry wt	Quantitation Limit
Total Lead	8200	10

Date Analyzed: 03-03-2003
Method: EPA 6010A

Analyst: DC
Verified: LF

Continued on next page...

Mary J. R. Gilchrist, Ph.D.
Director

102 Oakdale Campus, #101 OH
Iowa City, Iowa 52242-5002
319/335-4500 Fax: 319/335-4555

http://www.uhl.uiowa.edu

H.A. Wallace Building
East Grand, Des Moines, Iowa 50319-0034
515/281-5371 Fax: 515/243-1349

Mercury in Solid Sample

nalyte	Concentration mg/kg by dry wt	Quantitation Limit
otal Mercury	2.6	1.0

te Analyzed: 03-03-2003
ethod: EPA 7471A-UHL

Analyst: TB
Verified: SB

Toxicity Characteristic Leaching Procedure (TCLP)

nalyte	Leachate mg/L	Regulatory Level mg/L	Method	Analyst/ Verifier	Date Analyzed
ead	3.1	5.0	EPA 1311/6010	DC/SB	03-10-2003

Description of units used within this report

mg/kg - Milligrams per Kilogram
mg/L - Milligrams per Liter
Quant Limit - Lowest concentration reliably measured
mg/kg by dry wt - Milligrams per Kilogram by Dry Weight
pH Units - pH Units

wa Laboratory Certification No. 027. AIHA, NELAP, NVLAP, USEPA, and other credentials available upon request.

you have any questions please call Sherri Marine at 800/421-IOWA (4692) or 319/335-4500. Thank you.

End of Report

ry J. R. Gilchrist, Ph.D.
rector

102 Oakdale Campus, #101 OH
Iowa City, Iowa 52242-5002
319/335-4500 Fax: 319/335-4555

http://www.uhl.uiowa.edu

H.A. Wallace Building
East Grand, Des Moines, Iowa 50319-0034
515/281-5371 Fax: 515/243-1349

Mercury in Solid Sample

nalyte	Concentration mg/kg by dry wt	Quantitation Limit
otal Mercury	4.4	1.0

ate Analyzed: 03-03-2003
ethod: EPA 7471A-UHL

Analyst: TB
Verified: SB

Toxicity Characteristic Leaching Procedure (TCLP)

nalyte	Leachate mg/L	Regulatory Level mg/L	Method	Analyst/ Verifier	Date Analyzed
ead	0.89	5.0	EPA 1311/6010	DC/SB	03-10-2003
ercury	<0.02	0.20	EPA 1311/7470	TB/SB	03-10-2003

Description of units used within this report

mg/kg - Milligrams per Kilogram
mg/L - Milligrams per Liter
Quant Limit - Lowest concentration reliably measured
mg/kg by dry wt - Milligrams per Kilogram by Dry Weight
pH Units - pH Units

va Laboratory Certification No. 027. AIHA, NELAP, NVLAP, USEPA, and other credentials available upon request.

ou have any questions please call Sherri Marine at 800/421-IOWA (4692) or 319/335-4500. Thank you.

End of Report

y J. R. Gilchrist, Ph.D.
ector

102 Oakdale Campus, #101 OH
Iowa City, Iowa 52242-5002
319/335-4500 Fax: 319/335-4555

http://www.uhl.uiowa.edu

H.A. Wallace Building
East Grand, Des Moines, Iowa 50319-0034
515/281-5371 Fax: 515/243-1349

Hygienic Laboratory

The University of Iowa

Date of report: 03-12-2003

SHANE DODGE
EPD 6
1004 WEST MADISON

WASHINGTON IA 52353

Sample Number	**200301149**
Date Received	02-24-2003
Project	04WQFS
Date Collected	02-20-2003 10:15
Collection Site	a-18 general storage fluff
Collection Town	
Description	fluff
Reference	ALTER SCRAP
Collector	DODGE SHANE
Phone	(319) 653-2135
Purchase Order	

Comments: *Upon receipt at the UHL sample meets standard acceptance criteria EXCEPT: sample temperature exceeds 6 degrees celsius.*

Results of Analyses

TCLP Extraction

Analyte	Concentration	Method	Analyst/ Verifier	Date Analyzed
Leachate pH	6.5 pH Units	EPA 1311	PJM/LF	03-06-2003

Polychlorinated biphenyls in Solids

Analyte	Concentration mg/kg	Quantitation Limit
Aroclor 1016	<0.5	0.5
Aroclor 1221	<0.5	0.5
Aroclor 1232	<0.5	0.5
Aroclor 1242	57	0.5
Aroclor 1248	<0.5	0.5
Aroclor 1254	8.4	0.5
Aroclor 1260	<0.5	0.5

Date Analyzed: 03-04-2003
Method: EPA 8082
Date Prepared: 02-27-2003
Preparation Method: EPA 3550/3630

Analyst: VR
Verified: DLZ
Analyst: RAD
Verified: GJ

Lead in Solid Sample

Analyte	Concentration mg/kg by dry wt	Quantitation Limit
Total Lead	3800	10

Date Analyzed: 03-03-2003
Method: EPA 6010A

Analyst: DC
Verified: LF

Continued on next page...

Mary J. R. Gilchrist, Ph.D.
Director

102 Oakdale Campus, #101 OH
Iowa City, Iowa 52242-5002
319/335-4500 Fax: 319/335-4555

http://www.uhl.uiowa.edu

H.A. Wallace Building
East Grand, Des Moines, Iowa 50319-0034
515/281-5371 Fax: 515/243-1349

Mercury in Solid Sample

Analyte	Concentration mg/kg by dry wt	Quantitation Limit
Total Mercury	66	1.0

Date Analyzed: 03-03-2003
Method: EPA 7471A-UHL
Analyst: TB
Verified: SB

Toxicity Characteristic Leaching Procedure (TCLP)

Analyte	Leachate mg/L	Regulatory Level mg/L	Method	Analyst/ Verifier	Date Analyzed
Lead	<0.50	5.0	EPA 1311/6010	DC/SB	03-10-2003
Mercury	<0.02	0.20	EPA 1311/7470	TB/SB	03-10-2003

Description of units used within this report

mg/kg - Milligrams per Kilogram
mg/kg by dry wt - Milligrams per Kilogram by Dry Weight
mg/L - Milligrams per Liter
pH Units - pH Units
Quant Limit - Lowest concentration reliably measured

Iowa Laboratory Certification No. 027. AIHA, NELAP, NVLAP, USEPA, and other credentials available upon request.

If you have any questions please call Sherri Marine at 800/421-IOWA (4692) or 319/335-4500. Thank you.

End of Report

Gary J. R. Gilchrist, Ph.D.
Director

102 Oakdale Campus, #101 OH
Iowa City, Iowa 52242-5002
319/335-4500 Fax: 319/335-4555

http://www.uhl.uiowa.edu

H.A. Wallace Building
East Grand, Des Moines, Iowa 50319-0034
515/281-5371 Fax: 515/243-1349

Hygienic Laboratory

The University of Iowa

Date of report: 03-12-2003

SHANE DODGE
EPD 6
1004 WEST MADISON

WASHINGTON IA 52353

Sample Number	**200301148**
Date Received	02-24-2003
Project	04WQFS
Date Collected	02-20-2003 10:00
Collection Site	c-18 todays fluff
Collection Town	
Description	fluff
Reference	ALTER SCRAP
Collector	DODGE SHANE
Phone	(319) 653-2135
Purchase Order	

Comments: *Upon receipt at the UHL sample meets standard acceptance criteria EXCEPT: sample temperature exceeds 6 degrees celsius.*

Results of Analyses

TCLP Extraction

Analyte	Concentration	Method	Analyst/ Verifier	Date Analyzed
Leachate pH	6.6 pH Units	EPA 1311	PJM/LF	03-06-2003

Polychlorinated biphenyls in Solids

Analyte	Concentration mg/kg	Quantitation Limit
Aroclor 1016	<0.5	0.5
Aroclor 1221	<0.5	0.5
Aroclor 1232	<0.5	0.5
Aroclor 1242	41	0.5
Aroclor 1248	<0.5	0.5
Aroclor 1254	4.9	0.5
Aroclor 1260	<0.5	0.5

Date Analyzed: 03-04-2003
Method: EPA 8082
Date Prepared: 02-27-2003
Preparation Method: EPA 3550/3630

Analyst: VR
Verified: DLZ
Analyst: RAD
Verified: GJ

Lead in Solid Sample

Analyte	Concentration mg/kg by dry wt	Quantitation Limit
Total Lead	2300	10

Date Analyzed: 03-03-2003
Method: EPA 6010A

Analyst: DC
Verified: LF

Continued on next page...

Mary J. R. Gilchrist, Ph.D.
Director

102 Oakdale Campus, #101 OH
Iowa City, Iowa 52242-5002
319/335-4500 Fax: 319/335-4555

http://www.uhl.uiowa.edu

H.A. Wallace Building
East Grand, Des Moines, Iowa 50319-0034
515/281-5371 Fax: 515/243-1349

CPI
Environmental Services, Inc.
799 Roosevelt Rd., Bldg 6, Ste. 110 - Glen Ellyn, Illinois 60137
phone: 630/469-6340 — *fax:* 630/469-6470

July 2, 2003

Mr. Shane M. Dodge
Environmental Specialist
Iowa Dept. of Natural Resources
Field Office No. 6
1004 W. Madison
Washington, IA 52353

Subject: Alter Scrap Processing, Davenport Facility
Completion of Plan of Action: Shredder Fluff Sampling & Disposal

Mr. Dodge:

CPI Environmental Services, Inc. ("CPI") has prepared this letter on behalf of Alter Scrap Processing ("Alter"), who has concluded implementation of the approved Plan of Action dated April 1, 2003. CPI prepared the Plan of Action ("Plan") on behalf of Alter as requested by Iowa Department of Natural Resources ("IDNR") in response to a Notice of Violation issued on March 20, 2003. IDNR granted approval of the Plan on April 1, 2003 and allowed Alter to resume disposal of shredder fluff in Iowa in accordance with the Plan.

Since March 18, 2003 and continuing for four disposal cycles, samples were collected and analyzed in accordance with the "Shredder Residue Waste Characterization & Disposal Procedures (Temporary)." Results were forwarded to you and Keith Krambeck of Scott Area Landfill and written authorization has been obtained from Mr. Krambeck prior to shipping the represented material.

CPI has completed an evaluation of analytical data obtained from the shredder fluff generated at the facility. CPI's evaluation included a review of available and representative data as generated during the Plan and since 2002. Based on an evaluation of data, approval is being requested for the following adjustments in sampling activities:

1. Quarterly TCLP lead and mercury analysis
2. Testing seven-day composite sample of Recycle Cover fraction only
3. Monthly total PCB analysis for an additional four months (June through September) to be reduced to quarterly thereafter
4. Statistical evaluation for compliance with Chapter 118.14(1) of the Iowa Administrative Code ("IAC"), Part 567

1. Quarterly TCLP lead and mercury analysis

Analytical results for data obtained from the three size fractions of shredder residue for 2002 and 2003 show no occurrence of TCLP mercury reported in excess of detection limits (see

Table 1 attached). TCLP lead was reported in excess of detection limits in approximately 55 percent of samples tested with only one occurrence (i.e., 5.31 mg/L in 6/12/02 "recycle cover" sample) in slight exceedence of the maximum allowable concentration of 5.0 mg/L. The arithmetic mean of TCLP lead results obtained in 2002 and 2003 (using one-half the reported detection limit for "non-detect" samples) is 0.90 mg/L with an estimated 90-percent upper confidence limit for the mean of log-transformed data of 1.68 mg/L[1].

Based on these established trends and the limited risk of a statistically significant exceedence of the TCLP lead and mercury criteria, approval is requested to reduce testing of TCLP lead and mercury frequency to quarterly, as prescribed in IAC Chapter 118.14(1). Evaluation of this quarterly data for compliance with IAC 118.14(1) will be conducted as described in #4 below. If approved, the next sampling event for TCLP lead and mercury will be October 2003.

2. Testing seven-day composite sample of "fluff" fraction only

Currently, at the request of Scott Area Landfill, Alter obtains a seven-day composite sample from three fractions of shredder residue: fluff, 2" down, and recycle cover. These fractions are produced from the same in-feed material into the hammermill, and are collected from different points within the separation process downstream of the hammermill. Material sampled as "fluff" is the initial nonferrous material collected by the cyclones before entering the screening or eddy current area. The "fluff" fraction may be further reprocessed back through the hammermill and segregated to reduce its size to less than two inches. Material less than 2-inches in size (2" down) is sent through the eddy current to remove additional nonferrous, recyclable metals, and material less than 3/8-inch in size is sold for beneficial use as recycle cover. No additional potential PCB, lead, or mercury sources are introduced during the eddy current and screening processes. Therefore, on average, the three fractions would be expected to be of similar compositions and display similar concentrations of chemicals.

To verify whether the fractions are representative of the waste stream as a whole and comparable to each other, analytical results obtained for sampling events conducted between June 2002 and June 2003 in which all three fractions were analyzed during the same sampling event were compared to an average of the overall waste stream during the sample sampling periods (see Table 2 attached)[2]. Only results from total PCBs were compared, since limited to no detection of TCLP lead and TCLP mercury, respectively, prevents meaningful comparisons.

[1] An upper confidence limit for the mean is an interval estimate for the mean. That is, for a 90% confidence interval, if many samples are collected and the confidence interval computed, in the long run about 90% of these intervals would contain the true mean. Interval estimates are often desirable, especially for large quantities of continuously generated materials that are to be represented by a small sample volume, because the estimate of the mean varies from sample to sample. Instead of a single estimate for the mean, an upper confidence interval generates an upper limit for the mean. The interval estimate gives an indication of how much uncertainty there is in an estimate of the true mean. The narrower the interval between the value of the mean and the upper confidence limit, the more precise the estimate. Due to an apparent lognormal distribution, the 90-percent upper confidence limit on the mean was estimated using log-transformed data. Due to the high percentile of non-detect values, non-parametric methods may provide a better estimate; however, for purposes of the current analysis, lognormal calculations were used to estimate value.

[2] Testing in select months was limited to the fractions that were being disposed at the landfill during that sampling period; for example, if the "recycle cover" quota was met already for the sampling period and no additional recycle cover was being accepted, the recycle cover would not be analyzed and the 2" down fraction results were used for disposal approval.

Averages of the three waste streams are shown to be comparable with a relative percent difference of approximately 10 percent, ranging from 23.49 mg/kg to 24.48 mg/kg (see Figure 1 attached). The averages of each individual fraction also are comparable to the overall waste stream average of 24.78 mg/kg[1], with a relative percent difference of approximately 10 percent. This reaffirms that, on average, each size fraction is representative of the feedstock material. The recycle cover fraction also most closely reflects the overall waste stream based on the comparison between its 90 percent UCL[2] (Table 1, 28.30 mg/kg) to the overall waste stream 90 percent UCL of 28.13 mg/kg. The recycle cover, with a standard deviation ("s") from the mean[3] of 5.09 mg/kg, most closely mimics the deviation from the mean of the overall waste stream (s = 3.63). This likely is a function of the recycle covers ability to be thoroughly composited and the nature of the screening process. The 2" down fraction shows the greatest deviation in concentrations (s = 14.77), and the deviation of the fluff samples from the mean is moderate (s = 12.34), as compared to the 2" down and recycle cover fractions independently, and comparable to the 2" down and recycle cover combined (s = 8.28). This analysis suggests that the fluff fraction being sampled likely is primarily composed of 2" down and recycle cover, yet sampling and particle size biases cause deviations from the mean more readily in these larger fractions. In addition, the laboratory is limited to the size of material that can be tested, and therefore, it is likely that the component of the 2" down and the fluff that gets tested is similar in size and nature to recycle cover. The greater deviation displayed by the fluff and 2" down, therefore, likely is attributed to chemist biases, the variation in surface area (which may bias analysis) and an inability of the larger material fraction to be thoroughly composited.

Based on these results, Alter requests to continue collecting and testing the Recycle Cover fraction to represent the waste stream as a whole and discontinue testing the 2-inch down and the fluff fractions.

3. Monthly total PCB analysis for an additional four months (June through September) to be reduced to quarterly thereafter

Alter requests that the current sampling frequency for PCBs also be decreased from its current 14-operating-day cycle to monthly. Alter will continue collecting a seven-day composite sample beginning the first operating day of the month and continuing for seven consecutive shredder-operating days. The seven-day composite sample will be analyzed for total PCBs and will represent the overall waste stream generated that calendar month. Results will be obtained and analyzed for compliance with established regulatory criteria as detailed in #4 below and communicated to Scott Area Landfill prior to shipping fluff for disposal that month.

Alter proposes to perform monthly sampling as described above for four months beginning June and discontinuing at the end of September. At the conclusion of the four-month testing period, after statistical evaluation of potential trends, Alter will return to quarterly seven-day

[1] This overall waste stream average obtained from this subset of data (24.78 mg/kg with 90% UCL of 26.75 mg/kg)), as presented in Table 2, is comparable to the average obtained from the full 2002-2003 dataset (25.42 mg/kg with 90% UCL of 28.31 mg/kg), as presented in Table 1.
[2] A 0.10 confidence interval (or 90 percent UCL) is consistent with USEPA solid waste sampling guidance as published in SW846, Chapter 9 (USEPA, 1986).
[3] The standard deviation is a measure of data "spread" from the mean. A smaller standard deviation indicates greater concentration of sample distribution closer to the mean.

composite sampling beginning in the fourth quarter of 2003. A seven-day composite sample will be collected subsequently during the first month of each quarter (i.e., October 2003, January 2004, April 2004, and July 2004, etc.) to be analyzed for total PCBs, TCLP lead and mercury. Results will be obtained and analyzed for compliance with regulatory criteria as detailed in #4 below and communicated to Scott Area Landfill prior to shipping fluff for disposal that quarter.

4. Statistical Approaches in Determining Compliance with Chapter 118.14(1)

Large quantities of continuously generated material subject to compliance testing, either for quality control purposes or environmental compliance, often are best represented through on-going statistical evaluations to evaluate trends rather than a single sample. Long-term monitoring through statistical evaluations provides more meaningful results of the true nature of the material and provides more information than a single sample. In regard to waste sampling, unless one is dealing with a homogeneous waste from which one sample can represent the whole population and, therefore, truly be called a "representative sample," it is often best to consider a "representative data base" generated by collection and analysis of more than one sample that defines the average properties or composition of the material (USEPA, 1996).

Criteria for compliance with IAC Chapter 118.1(4) will be based on a comparison of statistical bounds for true concentration based on on-going measured concentrations. The objective will be to determine if the material displays a statistically significant exceedence of the compliance criteria as outlined in IAC Chapter 118.14(1) by evaluating trends of the data set, as opposed to a single sampling event. This will reduce the effects of analytical, sampling, temporal, and spatial variability in the roles of the decision-making process.

The 90 percent upper confidence limit (UCL) for the mean of at least four samples of the recycle cover fraction will be compared to relevant criterion. A 0.10 confidence interval is consistent with USEPA solid waste sampling guidance as published in SW846, Chapter 9 (USEPA, 1986). The initial dataset will be composed of data obtained from the recycle cover fraction since 2002. After each sampling event, the mean and standard deviation will be recalculated for total PCBs and/or TCLP lead and mercury for the recycle cover fraction, and the resulting 90 percent UCL will be compared with the Chapter 118.14(1) criteria. Statistical approaches will be performed consistent with those outlined in Gibbons *et. al.* (2001) and USEPA (1986). Reports of the 90 percent UCL will be submitted to Scott Area Landfill and IDNR monthly until the fourth quarter of 2003, at which time they will be decreased to quarterly. Original analytical reports, sampling logs, and chain of custody records will be maintained at the facility for a period of three years, and shall be available to both the landfill and IDNR upon request.

Alter will continue to monitor statistically significant trends over time to predict potential exceedence of criterion before occurrence. In the event the 90 percent UCL for the mean exceeds the established disposal criteria for any of the parameters tested, disposal will cease and a corrective action plan will be developed and implemented at that time.

On behalf of Alter, CPI requests IDNR consider these requests at this time. If you have questions or require additional information, please feel free to contact Michael Place at (630) 469-6340 extension 101 or me at extension 109.

Sincerely,
CPI Environmental Services, Inc.

MB Place, for

Sarah Schlichtholz
Geologist

c: Keith Krambeck, Scott Area Landfill (facsimile)
Chris Morehouse, Alter Scrap Processing (hardcopy)

References:

USEPA (1986). SW-846, *Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, 3rd Edition.*

Gibbons, R.D. and Coleman, D.E. (2001). *Statistical Methods for Detection and Quantification of Environmental Contaminants.* Wiley & Sons, Inc., New York.

Table 1. Davenport Facility Shredder Fluff Analysis Summary Table (2002-2003)

Residue Type	Date of Collection	Total PCBs	TCLP Lead		ln(lead)	TCLP Mercury	
F, RC	3/2/02	8.33	<	0.10	-2.30	na	
RC	3/2/02	43.50	<	0.10	-2.30	<	0.001
F	4/11/02	27.20	<	0.05	-3.00	na	
RC	4/11/02	24.30		0.38	-0.97	<	0.001
F	5/10/02	42.90		3.60	1.28	na	
RC	5/10/02	43.40		0.95	-0.05	<	0.001
F	6/12/02	8.50		4.90	1.59	na	
RC	6/12/02	20.70		5.31	1.67	<	0.001
2D	6/12/02	41.50	<	0.25	-1.39	na	
F	10/14/02	21.70	<	0.15	-1.90	<	0.001
RC	10/14/02	23.80		0.49	-0.71	<	0.001
2D	10/14/02	43.60		2.40	0.88	<	0.001
F	11/7/02	48.80	<	0.05	-3.00	<	0.001
RC	11/7/02	22.40	<	0.10	-2.30	<	0.001
2D	11/7/02	1.80	<	0.05	-3.00	<	0.001
RC	1/8/03	24.60	<	0.15	-1.90	<	0.001
2D	1/8/03	4.30	<	0.05	-3.00	<	0.001
F	3/7/03	19.60		0.10	-2.30	<	0.005
RC	3/7/03	18.40	<	0.05	-3.00	<	0.005
2D	3/7/03	20.20		0.43	-0.84	<	0.005
RC	3/21/03	39.00	<	0.05	-3.00	<	0.005
2D	3/21/03	10.00		2.33	0.85	<	0.05
F	4/7/03	28.90		0.44	-0.82	<	0.001
2D	4/7/03	17.30	<	0.15	-1.90	<	0.001
RC	4/7/03	19.00		0.45	-0.80	<	0.001
F	4/24/03	20.66		3.20	1.16	<	0.001
2D	4/24/03	26.12		1.20	0.18	<	0.001
RC	4/24/03	32.66	<	0.10	-2.30	<	0.001
F	5/20/03	23.20	<	0.15	-1.90	<	0.001
2D	5/20/03	34.00	<	0.15	-1.90	<	0.001
RC	5/20/03	27.50	<	0.15	-1.90	<	0.001

	Total PCBs	TCLP Lead		TCLP Mercury
		Normal	Log-Transformed	
Total No. of Samples =	31	31	31	26
Total No. < SQL =	0	17	17	26
Minimum Detected Value=	1.80	0.05	--	0.001
Maximum Detected Value =	48.80	5.31	--	0.05
Arithmetic Mean =	25.42	0.90	-1.25	0.004
Standard Dev. =	12.30	1.47	1.51	--
Student t-statistic =	1.310	--	NA	--
H Value =	NA	--	2.282	--
90% UCL =	**28.31**	--	**1.68**	--

Key:

F = Fluff (> 2", cyclone waste)
RC = Recycle Cover
2D = 2" Down
na = not analyzed for parameter
< = not reported in excess of reported sample detection limit

Note:

One-half detection limit (DL) reported for results reported less than DL
Total PCB data determined to be normally distributed
TCLP Lead UCL estimated assuming log-normal distribution
No UCL calculated for TCLP mercury since non-detect
Student's t-statistic taken from USEPA, 1986; based on one-tailed confidence interval and a probability of 0.10
Estimated $H_{0.10}$ value obtained from Gibbons et. al. 2001 based on 0.90 confidence, 30 df and approx. standard deviation of log-transformed data of 1.50

ATTACHMENT 8 Page 6 of 8

Table 2. Comparison of Total PCB Results for Three Fluff Fractions

	Total PCBs (mg/kg)				
				Average	Average per Sampling Event
Sampling Date	Fluff	2" Down	Recycle Cover	2" Down + Recycle Cover	Overall Waste Stream
6/12/02	8.50	41.50	20.70	31.10	23.57
10/14/02	21.70	43.60	23.80	33.70	29.70
11/7/02	48.80	1.80	22.40	12.10	24.33
3/7/03	19.60	20.20	18.40	19.30	19.40
4/7/03	28.90	17.30	19.00	18.15	21.73
4/24/03	20.66	26.12	32.66	29.39	26.48
5/20/03	23.20	34.00	27.50	30.75	28.23
Arithmetic Mean	**24.48**	**26.36**	**23.49**	**24.93**	**24.78**
# of samples	7	7	7	7	7
Standard Deviation	**12.34**	**14.77**	**5.09**	**8.28**	**3.63**
student t-statistic	**1.44**	**1.44**	**1.44**	**1.44**	**1.44**
90% UCL	**31.20**	**34.40**	**26.26**	**29.43**	**26.75**

NOTES:

Student's t-statistic taken from USEPA, 1986; based on one-tailed confidence interval and a probability of 0.10

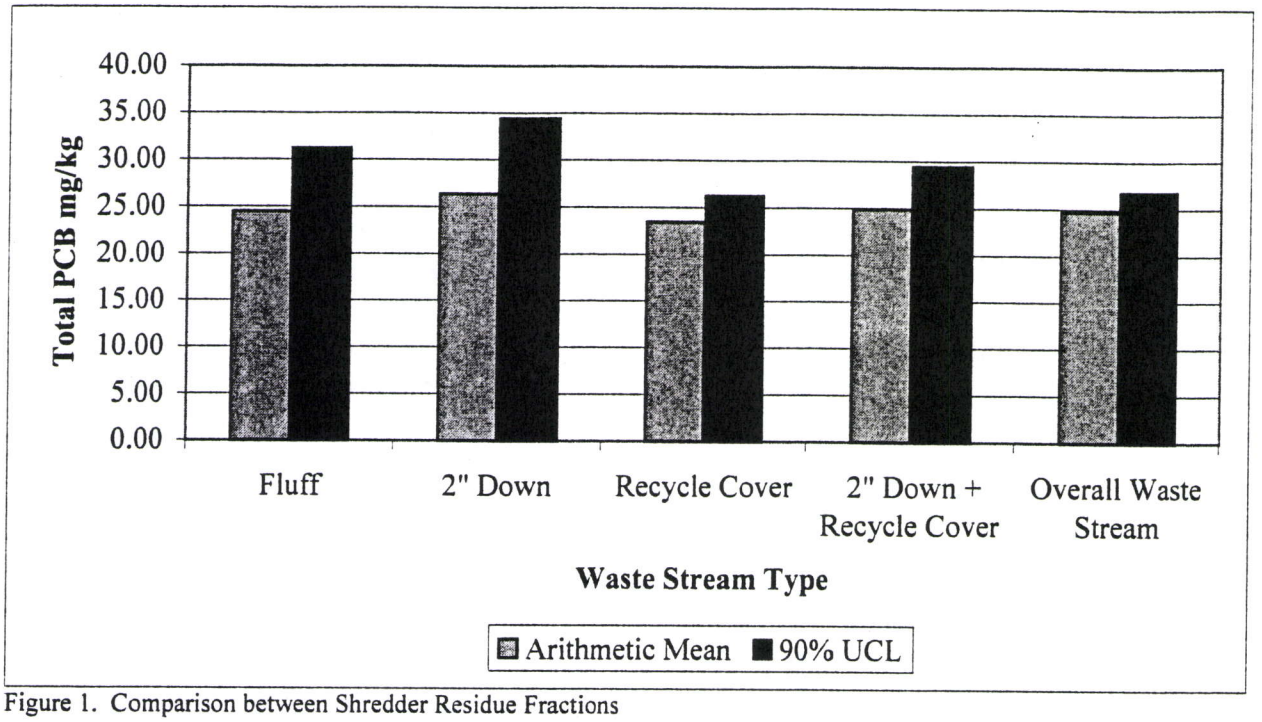


Figure 1. Comparison between Shredder Residue Fractions

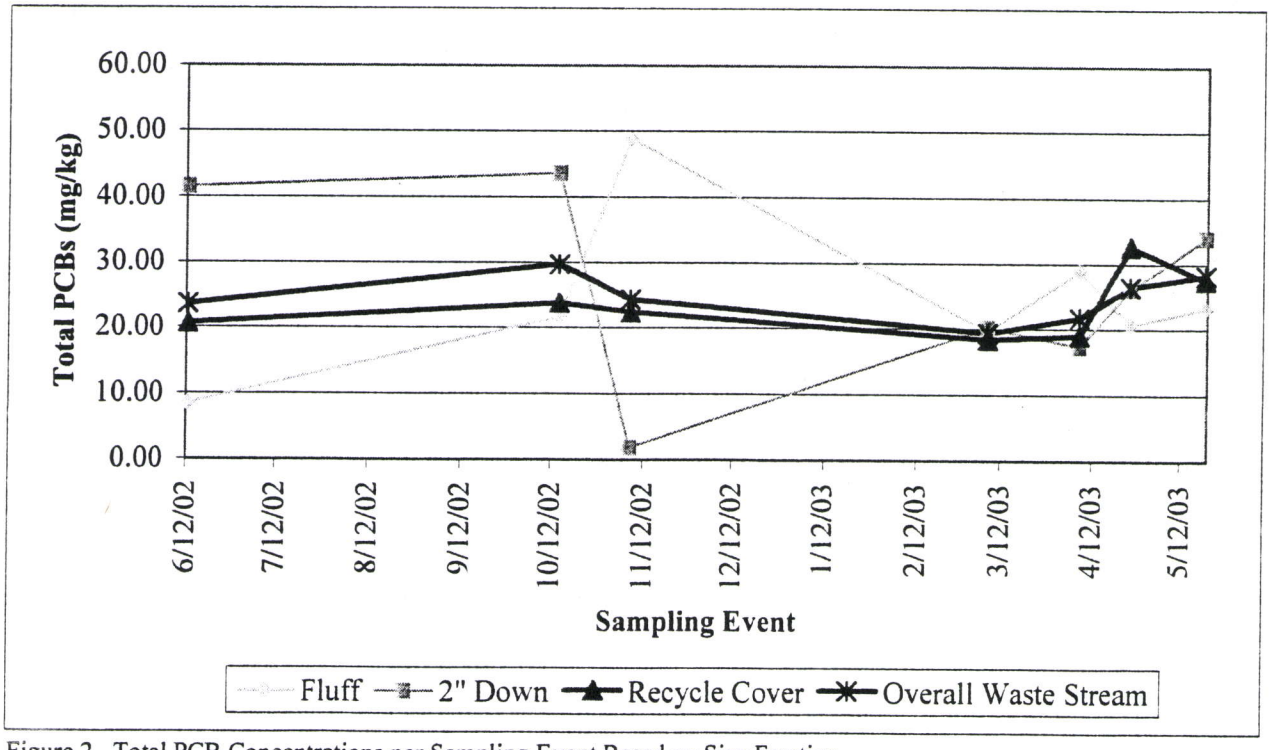


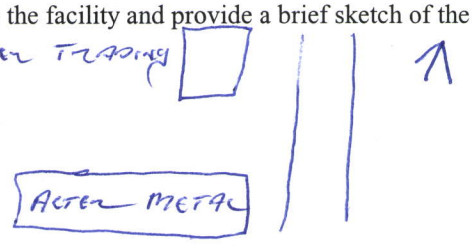
Figure 2. Total PCB Concentrations per Sampling Event Based on Size Fraction

Facility: ALTER METAL CO Date: 12-1-04 Arrival time: 10:22 A-M

DRIVE-BY

1. Drive-by conducted from public right-of-way? ☒ Yes ☐ No

2. Determine the direction "North" with respect to the facility and provide a brief sketch of the layout and orientation (as can be viewed from the public right-of-way):



3. Obvious concerns visible from public right-of-way (photos)? ☐ Yes ☐ No

- Containers
- Tanks- Processing Equipment
- Loading Areas
- Unloading Areas
- Security Devices
- Open Drums
- Stressed Vegetation
- Unusual Staining
- Unusual Odors
- Obvious Discharges
- Improper Disposal
- Safety Concerns
- Other Concerns

SITE ENTRY AND INBRIEFING

1. ☐ Used main entrance ☐ Entered during normal operating hours
☐ Excessive delays (>15 minutes - denial of access?) - ☐ No

2. Facility Representative(s): CHRIS MOREHOUSE Title: PLANT MANAGER
GUY JACKSON Title: DIRECTOR OF SAFETY (ST LOUIS)
DENNY CHENOWETH Title: SUPERVISOR

3. Does representative have intimate knowledge of all waste management practices?
☒ Yes ☐ No How long in position? 7½ Yrs

4. **Introduction:**
☒ Presented credentials
☒ Explained responsibility to provide accurate information and provided copies of Section 1001 and 1002 U.S.C. to facility
☒ Verified presence at correct facility (checked address/I.D. #)
☒ Explained authority to conduct inspection (Section 3007 of RCRA)
☒ Identified personal safety considerations: ALL
☒ Explained the purpose, scope, and order of the inspection
☒ Completed Multimedia screening checklist
☒ Explained documentation process - worksheets, checklists, photo's, notes, statements, etc
☒ Provided SBRFA
☐ Obtained GPS reading
☒ Explained facility's right to claim CBI

5. Was full access granted?
☒ Yes ☐ By facility representative or Other(name):_____
☐ No - Access denied Name of person denying access:_____
Time of denial:_____
Reason for denial, or limitations placed on access:

FACILITY BACKGROUND WORKSHEET

1. Site history:

Date facility began operating: 1940's Number of employees: 55

Number of shifts/hours worked: 1 Number of days worked per week: 6

Size (sq. ft., how divided): ESTIMATED 32,000

Property owner and facility operator the same? ☒ YES ☐ NO

2. Major products or services provided: RECYCLABLE MATERIAL WHOLESALERS

3. Major raw materials used: METAL

4. Major manufacturing or processing operations which generate waste streams:
(provide brief description)

Operation/Process	Waste Stream(s)
PARTS WASHERS	SPENT SOLVENT
MOTORIZED EQUIPMENT	USED OIL
PRODUCTION EQUIPMENT	HYDRAULIC FLUID

5. Complete a Generator Waste Stream Worksheet and/or Off-Site Waste Stream Worksheet for the waste streams noted above and then finish this form.

6. Verified/compared above information with facility Notification Form: ☐ YES ☒ NO

NOTIFICATION FORM NOT AVAILABLE

7. **GENERATOR STATUS:** (based on records review)

☐ Non-generator

☒ CE (0-100kg/mo or 1 kg/mo acute waste and accumulate <1000 kg or 1 kg acute waste or 100 kg of acute spill residue)

☐ SQG (100-1000kg/mo and accumulate <6000 kg)

☐ LQG (>1000kg/mo)

Is facility's status solidly within above category? ☐ YES ☐ NO

(If not carefully verify status and document)

8. **TSD STATUS:** ☐ Treatment ☐ Storage ☐ Disposal

Note: Types of units, number of units, capacities, processes, etc.

9. Resolved questions from Pre-Inspection Worksheet? ☐ YES ☐ NO ☒ No Questions

10. Resolved compliance officers questions from Pre-Inspection Worksheet? ☒ YES ☐ NO

☐ No Questions

11. Requested site map or diagram to identify all observations? ☐ YES ☒ None available

USED SATELLITE IMAGE

GENERATOR WASTE STREAM WORKSHEET

1. WASTE STREAM: SPENT SOLVENT (PARTS WASHER)

FACILITY DETERMINATION: ☒ Hazardous ☐ Nonhazardous ☐ Not done ☐ Inadequate
WASTE CODES: D001

DETERMINATION METHOD: ☒ product knowledge ☐ process knowledge ☐ testing
Documentation: MSDS
GENERATING PROCESS: PARTS WASHER

GENERATION RATE: 15 GAL/MO

ON-SITE MANAGEMENT: satellites ☐ visually inspected storage ☐ visually inspected
NO STORAGE- IN PARTS WASHER

OFF-SITE MANAGEMENT / DISPOSITION: SAFETY-KLEEN

2. WASTE STREAM: USED OIL

FACILITY DETERMINATION: ☐ Hazardous ☒ Nonhazardous ☐ Not done ☐ Inadequate
WASTE CODES:

DETERMINATION METHOD: ☒ product knowledge ☐ process knowledge ☐ testing
Documentation:
GENERATING PROCESS: MOTORIZED AND PRODUCTION EQUIPMENT

GENERATION RATE: APPROXIMATELY 400 GAL/MO

ON-SITE MANAGEMENT: satellites ☒ visually inspected storage ☒ visually inspected

OFF-SITE MANAGEMENT / DISPOSITION: SAFETY-KLEEN

3. WASTE STREAM: APPLIANCE DEMANUFACTURING SHREDDER FLUFF

FACILITY DETERMINATION: ☐ Hazardous ☒ Nonhazardous ☐ Not done ☐ Inadequate
WASTE CODES:

DETERMINATION METHOD: ☐ product knowledge ☐ process knowledge ☒ testing
Documentation: ATTACHED
GENERATING PROCESS: SHREDDING APPLIANCE BODIES

GENERATION RATE: APPROXIMATELY ~~100 TONS/DAY~~ 200-300 LBS/DAY

ON-SITE MANAGEMENT: satellites ☐ visually inspected storage ☐ visually inspected

OFF-SITE MANAGEMENT / DISPOSITION: GENERAL TRASH- SCOTT AREA LANDFILL

4. WASTE STREAM:

FACILITY DETERMINATION: ☐ Hazardous ☐ Nonhazardous ☐ Not done ☐ Inadequate
WASTE CODES:

DETERMINATION METHOD: ☐ product knowledge ☐ process knowledge ☐ testing
Documentation:
GENERATING PROCESS:

GENERATION RATE:

ON-SITE MANAGEMENT: satellites ☐ visually inspected storage ☐ visually inspected

OFF-SITE MANAGEMENT / DISPOSITION:

RECORDS REVIEW WORKSHEET AND CHECKLIST

A. MANIFESTS

#	✓/x	REGULATORY REQUIREMENT	MANIFEST #'s AND COMMENTS
1.	✓	Facility uses manifest system-262.20(a)	
2.	✓	Manifests maintained for 3 years-262.40(a)	
3.	✓	Generator EPA I.D. number-262.20(a)	
4.	✓	Generator name, address, phone number-262.20(a)	
5.	✓	Transporter(s) name & EPA I.D. number-262.20(a)	
6.	✓	Designate facility name, address & EPA I.D. number-262.20(a)	
7.	✓	Alternate facility designated (optional)-262.20(c)	
8.	✓	Unique five digit document number and number of pages-262.20(a)	
9.	✓	DOT shipping name, hazard class, waste code, & RQ (if required-49 CFR 172)-262.20(a)	
10.	✓	Containers: numbers, type, quantity, unit wt/vol. -262.20(a)	
11.	✓	Proper certification (highway, rail, water or air) including waste minimization-262.20(a)	
12.	✓	Signed and dated-262.23(a)	
13.	✓	Exception report submitted if necessary-262.42	
14.	✓	Waste reclaimed under contractual agreement (SQG only)-262.20(e)(1)	
15.	✓	Generator maintains copy of contractual agreement (SQG only)-262.20(e)(2)	
16.	✓	LDR notification/certification sent with manifests on 1st shipment -268.7(a)	
17.	✓	LDR notification/certification includes: manifest number, correct EPA waste codes & treatment standards, and waste analysis data-268.7	
18.	✓	LDR notification/certification/ waste analysis data & other documents maintained for 3 years-268.7.(a)(8)	
19.	✓	Biennial Reports submitted per 262.41 (LQG only)	

✓-in compliance X-not in compliance N/A-not applicable

20. Approximate number of manifests generated since last inspection, or over past 3 years _____

21. Approximate number of manifests reviewed: _____

22. Copies of manifests made with regulatory violations? ☐ YES ☐ NO

J. USED OIL - RCRA INSPECTION CHECKLIST

1. What Used Oil activities does the facility engage in? SERVICE MOTORIZED PRODUCTION EQUIPMENT

   a. Type of used oil generated? MOTOR OIL & HYDRAULIC OIL
   b. Amount of used oil generated? 400 GAL/MO

40 CFR 279.12 Prohibition Questions

1. Is used oil being managed only in a surface impoundment or waste pile subject to regulation under 40 CFR Parts 264 or 265? ☐ Yes ☒ No ☐ Not Applicable (NA)
2. Is used oil being used as a dust suppressant? ☐ Yes ☒ No
3. Is off-specification oil fuel burned for energy recovery in only industrial furnaces, industrial boilers, utility boilers, used oil-fired space heaters, or hazardous waste incinerators identified in 40 CFR Part279.12 (C)(1-3)? ☐ Yes ☒ No

Subpart C - Standards for Used Oil Generators

(Check here ☐ if this section is NA)

✎ *Instructions:* *Fill out this section if the facility generates used oil or if facility activities first caused the used oil to become subject to regulation (see definition and applicability of used oil generator in 40 CFR 279.20). Used oil generators are subject to all applicable Spill Prevention, Control and Countermeasures (SPCC) requirements (40 CFR Part 112) and underground storage tank standards (40 CFR Part 280) in addition to the requirements of Subpart C.*

Regulation and Standard		*Violations*
279.21 Hazardous Waste Mixing		
1. Is the generator mixing hazardous waste with used oil?	☐ Yes ☒ No ☐ NA	
If yes, is the generator of a used oil containing greater than 1,000 parts per million (ppm) total halogens managing the used oil as a hazardous waste unless the used oil presumption is rebutted?	☐ Yes ☐ No ☒ NA	
2. Are analytical data available?	☐ Yes ☐ No ☒ NA	
279.22 Used Oil Storage		
1. Does the generator only store used oil in tanks, containers, or units subject to regulation under 40 CFR Parts 264 or 265?	☒ Yes ☐ No ☐ NA	
2. Are containers and aboveground tanks used by a generator to store used oil in good condition, with no visible leaks?	☒ Yes ☐ No ☐ NA	
3. Are containers, aboveground tanks, and fill pipes used for underground tanks labeled or marked "Used Oil"?	☒ Yes ☐ No ☐ NA	
4. Upon detection of a release of used oil, has the generator		
a. Stopped the release?	☐ Yes ☐ No ☒ NA	
b. Contained the release?	☐ Yes ☐ No ☒ NA	
c. Cleaned up and managed the used oil and other materials?	☐ Yes ☐ No ☒ NA	
d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary?	☐ Yes ☐ No ☒ NA	

Regulation and Standard		*Violations*
279.23 On-Site Burning in Space Heaters		
1. Is the generator burning used oil in used oil fired space heaters only when		
a. The heater burns only used oil that the owner or operator generates or used oil received from household do-it-yourself generators?	☐ Yes ☐ No ☒ NA	
b. The heater is designed to have a maximum capacity of not more than 0.5 million British Thermal Units per hour?	☐ Yes ☐ No ☒ NA	
c. The combustion gases from the heater are vented to ambient air?	☐ Yes ☐ No ☒ NA	
279.24 Off-Site Shipment		
1. Has the generator ensured that the used oil is hauled only by a transporter that has obtained an U.S. Environmental Protection Agency (EPA) identification (ID) number?	☒ Yes ☐ No ☐ NA	
2. Does the generator have a tolling arrangement with a transporter without an EPA ID number?	☐ Yes ☐ No ☒ NA	
If yes, answer the three following questions. If no, move to question 6.		
3. Is the used oil reclaimed and returned by the processor or re-refiner to the generator for use as a lubricant, cutting oil, or coolant?	☐ Yes ☐ No ☐ NA	
4. Does the tolling contract indicate the type of used oil and the frequency of shipment?	☐ Yes ☐ No ☐ NA	
5. Is the vehicle used to transport the used oil to the processing or re-refining facility and to deliver recycled used oil back to the generator owned and operated by the used oil processor or re-refiner?	☐ Yes ☐ No ☐ NA	
6. Does the generator transport used oil generated at the generator's site or used oil collected from household do-it-yourselfers to a used oil collection center or to aggregation points owned by the generator?	☐ Yes ☒ No ☐ NA	

Regulation and Standard		*Violations*
7. Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator?	☐ Yes ☒ No ☐ NA	
8. Does the generator transport no more than 55 gallons of used oil at any time?	☐ Yes ☐ No ☒ NA	
9. Does the generator transport the used oil to a used oil collection center that is registered, licensed, permitted, or recognized by a state/county/municipal government to manage used oil?	☐ Yes ☐ No ☒ NA	

For further Used Oil questions refer to Appendix 2-4:

- Subpart D - Standards for Used Oil Collection Centers and Aggregation Points
  Subpart E - Standards for Used Oil Transporters and Transfer Centers
  Subpart F - Standards for Used Oil Processors and Re-Refiners
  Subpart G - Standards for Used Oil Burners Who Burn Off-Specification Used Oil for Energy Recovery
  Subpart H - Standards for Used Oil Fuel Marketers

Appendix 1-10

EXIT BRIEFING

1. Reviewed all data collected and documented all concerns or violations? ☒ Yes ☐ No
   - Location of the violation, type and amount of waste involved, time frame, frequency, specific dates & when first started occurred
   - Illegal units - unit location (diagram/picture), dimensions, conditions, construction material, gradient of the base (for spills), other information.
   - Illegal disposal - how, when (each occurrence), where sent or disposed of, how shipped, who shipped, when shipped/disposed of, quantity

☐ Identified/verified violations from previous inspection were corrected (if applicable) N/A
☐ Addressed all unresolved inspection related issues N/A
☒ Summarized findings and observations for the facility representatives

NOV issued? ☐ Yes ☒ No ☐ Violations clearly identified and explained, including: circumstances, location, and applicable regulations

☐ Explained the importance of a timely (14 day) and adequate response N/A
☒ Explained that findings and observations are based on your current knowledge of RCRA and that the final findings may differ
☒ Explained that compliance officer will make the final compliance decisions and that all compliance questions should be directed toward them
☒ Explained that recommendations provided are for informational purposes only and DO NOT require specific actions by the facility
☒ Provided facility with CBI form
☒ Prepared Document Receipt form

3. Specific information requested from facility? ☐ Yes ☒ No

4. Facility appears to have awareness of RCRA regulations ☒ Yes ☐ No

5. Facility has its own environmental staff? ☐ Yes ☒ No
6. Facility has copy of applicable regulations? ☐ Yes ☒ No

7. Attitude and demeanor of facility representative(s): ☒ OK ☐ Not OK _____

8. Notes/Observations: _____

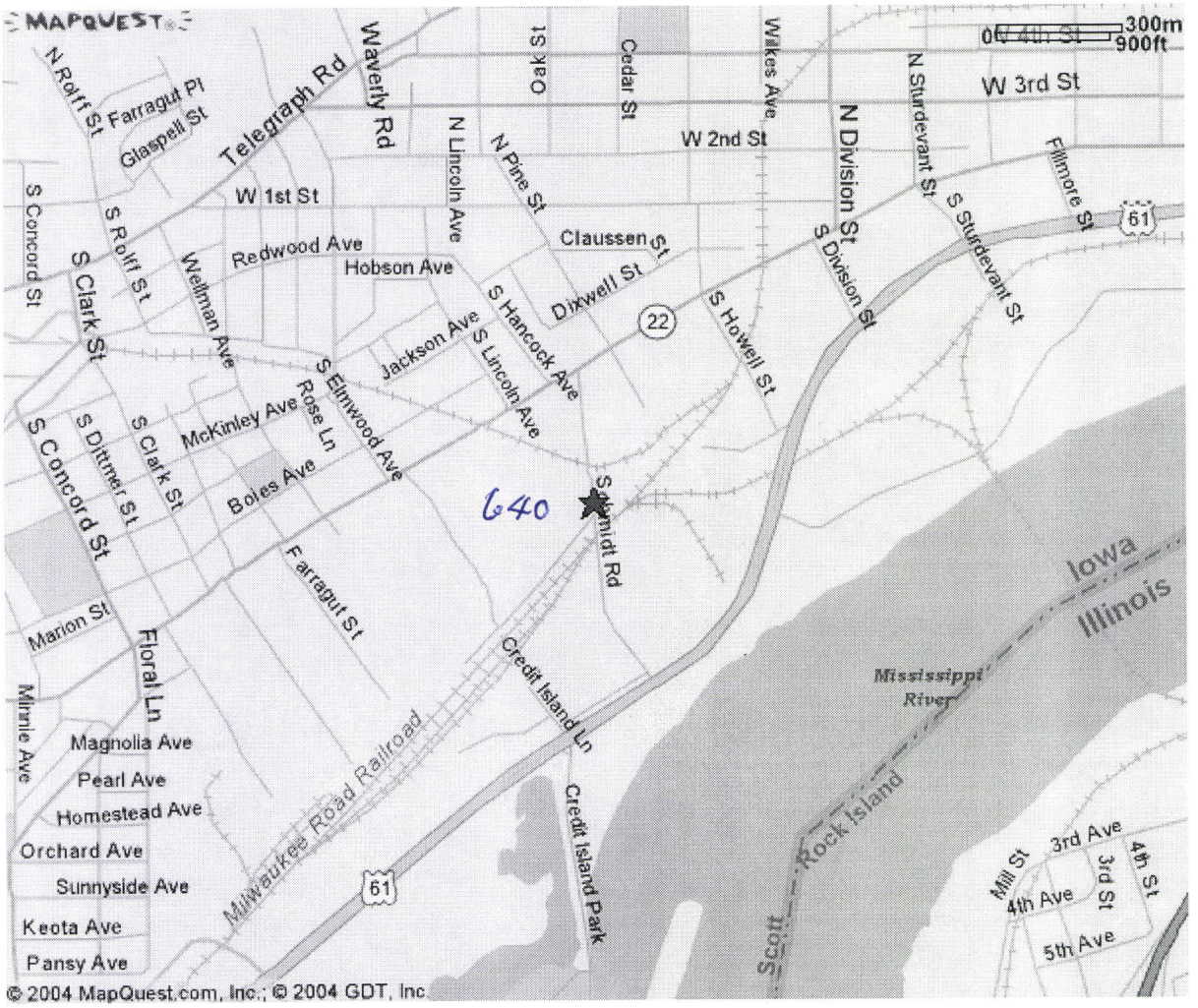
MAPQUEST

Send To Printer Back to Map

640 Schmidt Rd
Davenport IA
52802-2837 US

Notes:

ALTER SCRAP PROCESSING
640 SCHMIDT ROAD



ATTACHMENT 10 Page 1 of 2

Send To Printer Back To TerraServer Change to 11x17 Print Size Show Grid Lines Change to Landscape

USGS Davenport, Iowa, United States 30 March 2000

626 SCHMIDT ROAD - ALTER TRADING CORP.
640 SCHMIDT ROAD - ALTER SCRAP PROCESSING
- ALTER METAL COMPANY

ATTACHMENT D Page 2 of 2

ReferenceUSA℠

Business 12 Million U.S. Businesses | Residential

about us | contact us | help | home

Back

Revise My Criteria | New Search

Detailed Listing

Name:	ALTER TRADING CORP	**Employees:**	**Corporate:** **Location:** 50 to 99
Address:	626 SCHMIDT RD	**Est Sales:**	$50 to $100 MILLION
City:	DAVENPORT, IA 52802-2837	**Location:**	BRANCH
Contact:	CHRISTOPHER MOREHOUSE (CHIEF EXECUTIVE OFFICER)	**Headquarters:**	ALTER TRADING CORP
County:	SCOTT	**Credit Rating Code*:**	EXCELLENT
MSA (Metro Area):	DAVENPORT-MOLINE, IA-IL	**ABI Number:**	005666490
Phone:	(563) 328-3691	**Public:**	No
Fax:**	(563) 328-3692	**Stock Exchange:**	None
Fortune 1000 Ranking:	Not Available	**Ticker Symbol:**	Not Available
Foreign Parent:	NO	**Toll Free Number:**	Not Available
		URL:	ALTERTRADING.COM

SIC	Lines of Business	Ad Size	Year Appeared in YP
5051-11	METAL-DISTRIBUTORS		1989
3341-98	SECONDARY SMELTING & REFINING-NONFERROUS		1997
4499-99	WATER TRANSPORTATION SERVICES NEC		1989
5932-15	JUNK-DEALERS	BOLD	1993
6552-02	REAL ESTATE DEVELOPERS		1989

NAICS	Lines of Business
42351023	METAL MERCHANT WHOLS
33149204	SECONDARY PROCESSING OF OTHER NONFERROUS
48839009	OTHER SUPPORT ACTIVITIES-WATER TRANSPORTATION
45331021	USED MERCHANDISE STORES
23721005	LAND SUBDIVISION

Name	Title	Gender
REX WOOD	HUMAN RESOURCES EXECUTIVE	MALE

Map It! | Add to List

Show Businesses Within 1/10 mile | All Businesses

Show SIC's Within 1/10 mile | SIC Search

* Our Credit Rating Codes are indicators of probable ability to pay. They are based on business demographic factors such as number of employees, years in business, industry stability, bill paying history, barriers to entry, and government data. We recommend that these ratings be used primarily as a starting point and should not be the sole factor used in making a credit decision. You must obtain more information from bank and trade references, local credit bureaus, or other sources before extending credit. We will not be liable for any losses resulting from the use of this information.

** It is a violation of both federal and state law to transmit an unsolicited advertisement to a facsimile machine. Any person violating such laws may be subject to civil and criminal penalties which may exceed $500 for each transmission of any unsolicited facsimile. We provide business information for lawful purposes and expressly forbid the use of our business

ATTACHMENT 11 Page 1 of 5

ReferenceUSA℠

Business 12 Million U.S. Businesses | Residential

about us | contact us | help | home

Back

Revise My Criteria | New Search

Detailed Listing

Name:	ALTER SCRAP PROCESSING	**Employees:**	**Corporate:** **Location:** 50 to 99
Address:	640 SCHMIDT RD	**Est Sales:**	$20 to $50 MILLION
City:	DAVENPORT, IA 52802-2837	**Location:**	BRANCH
Contact:	CHRIS MOREHOUSE (PLANT MANAGER)	**Headquarters:**	ALTER TRADING CORP
County:	SCOTT	**Credit Rating Code*:**	EXCELLENT
MSA (Metro Area):	DAVENPORT-MOLINE, IA-IL	**ABI Number:**	886707629
Phone:	(563) 328-3601	**Public:**	No
Fax:**	(563) 328-3609	**Stock Exchange:**	None
Fortune 1000 Ranking:	Not Available	**Ticker Symbol:**	Not Available
Foreign Parent:	NO	**Toll Free Number:**	Not Available
		URL:	ALTERTRADING.COM

SIC	Lines of Business	Ad Size	Year Appeared in YP
5093-14	SCRAP METALS-PROCESSING/RECYCLING (WHOL)	IN-COLUMN	1994
3341-98	SECONDARY SMELTING & REFINING-NONFERROUS		1997
5093-12	RECYCLING CENTERS (WHOLESALE)	BOLD	1997
5932-15	JUNK-DEALERS	REGULAR	2001

NAICS	Lines of Business
42393020	RECYCLABLE MATERIAL MERCHANT WHOLS
33149204	SECONDARY PROCESSING OF OTHER NONFERROUS
42393017	RECYCLABLE MATERIAL MERCHANT WHOLS
45331021	USED MERCHANDISE STORES

Map It! | Add to List

Show Businesses Within 1/10 mile | All Businesses

Show SIC's Within 1/10 mile | SIC Search

* Our Credit Rating Codes are indicators of probable ability to pay. They are based on business demographic factors such as number of employees, years in business, industry stability, bill paying history, barriers to entry, and government data. We recommend that these ratings be used primarily as a starting point and should not be the sole factor used in making a credit decision. You must obtain more information from bank and trade references, local credit bureaus, or other sources before extending credit. We will not be liable for any losses resulting from the use of this information.

** It is a violation of both federal and state law to transmit an unsolicited advertisement to a facsimile machine. Any person violating such laws may be subject to civil and criminal penalties which may exceed $500 for each transmission of any unsolicited facsimile. We provide business information for lawful purposes and expressly forbid the use of our business information in any unlawful manner.

Back

Revise My Criteria | New Search

50 Prints/Downloads per Search

ATTACHMENT 11 Page 2 of 5

ReferenceUSA℠

Business 12 Million U.S. Businesses | Residential

about us | contact us | help | home

Displaying 1-3 of 3

Print | Download | Revise My Criteria | Purchase List | New Search | Details

All	Company Name	Address	City/State	ZIP	Phone	Linkage	
						Up	Down
☆	ALTER & SONS INC	514 S HOWELL ST	DAVENPORT, IA	52802	(563) 323-3601		
☐	ALTER SCRAP PROCESSING	640 SCHMIDT RD	DAVENPORT, IA	52802	(563) 328-3601	▲	
☐	ALTER TRADING CORP	626 SCHMIDT RD	DAVENPORT, IA	52802	(563) 328-3691	▲	

Print | Download | Revise My Criteria | Purchase List | New Search | Details

50 Prints/Downloads per Search

[business data] [residential data]
[about us] [contact us] [help] [home]

Contact Us Need Help? E-mail us at reference@infoUSA.com. Privacy

 5711 South 86th Circle P.O. Box 27347 Omaha, NE 68127

IP: 204.47.242.214

☆ DIFFERENT FACILITY

ATTACHMENT 11 Page 3 of 5

EPA United States Environmental Protection Agency

Handler - Handler Search

RCRAInfo

Enter the Handler Name, City and State you wish to search on:

Handler Name: alter%

Wildcard searches are allowed (i.e. %dupont%, auto%, etc.).

City: davenport

Wildcard searches are allowed (i.e. Ft%, %ville, etc.).

State: IA

Search **Cancel** **Clear**

Your search has found **6** handler(s).

Search Results

Act Loc	Handler Name	EPA Id	Street No.	Street Address	City	State	Zip Code	County	In a Universe
IA	ALTER-SONS	IAD022091730	514	S HOWELL	DAVENPORT	IA	52802	SCOTT	Y
IA	ALTER TRUCKING & TERMINAL CORP-FORMER SI	IAD169855723	1010	S FARRAGUT ST	DAVENPORT	IA	52802	SCOTT	N
IA	ALTER ENVIRONMENTAL SVCS - DUPLICATE ID#	IAD984568832	626	SCHMIDT RD	DAVENPORT	IA	52802	SCOTT	N
IA	ALTER METAL CO	IAD005263751	640	SCHMIDT RD	DAVENPORT	IA	52802	SCOTT	N
IA	ALTER TRADING CORPORATION	IAFILE000662	2333	ROCKINGHAM RD	DAVENPORT	IA	52802	SCOTT	Y
KY	ALTER TRUCKING & TERMINAL CORP-FORMER SI	IAD169855723	1010	SOUTH FARRAGUT STREET	DAVENPORT	IA	52808	OUT-OF-STATE	N

URL: /HANDLER2/Handler_srch.asp

(1) APPLIANCE DEMANUFACTURING COMPANY

(2) HOLDING COMPANY FOR ALTER METAL & ALTER SCRAP PROCESSING

ATTACHMENT II Page 4 of 5

RCRA Site Detail

Report run on: November 16, 2004 - 2:36 PM

IAD005263751 ALTER METAL CO

EPA Region 07 **Extract Flag:** X **Facility Identifier:** **County:** SCOTT

Universes

Generator: N
Transporter:

Full Enforcement: -----
Operating TSDF: -----
BOYSNC:
SNC:
Annual BOY Enf:

Subj CA:
Subj CA TSD 3004:
Subj CA TSD Discr:
Subj CA Non-TSD:
CA Wrkld:

Perm Prgrs: -----
Perm Wrkld: -----
Clos Wrkld: -----
Pclos Wrkld: -----
Controls in Place: No

Op Pmt GPRA:
PClos GPRA:
CA GPRA:
CA HE EI:
CA GW EI:

Activity Location: IA **Source Type:** Implementer **Seq. Number:** 1 **Receive Date:** 08 NOV 2002

Other/Previous Site Name: ALTER METAL CO

Location Address: 640 SCHMIDT RD
DAVENPORT, IA 52802

Mailing Address: 2333 ROCKINGHAM ROAD
DAVENPORT, IA 52808

Owner (current)
ALTER METAL COMPANY
From: To:

Type: Private
Phone:

Land Type: Bad code - Non Notifier: Exempt Commercial Availability: Other - U Tsd Date:
Accessibility: No. Employees: State District:

NAICS Codes: 42193 Recyclable Material Wholesalers

Ex. 2

[redacted]

Regulated Waste Activities

Hazardous Waste Generator Status - Federal: Not a Generator; State: HQ-N Not a Generator

Transfer Facility: Unknown

Other Hazardous Waste Generator Activities
- Importer Activity: Unknown
- Mixed Waste Generator: Unknown

Transporter Activity: No
TSD Activity: No
Recycler Activity: No

Exempt Boiler and/or Industrial Furnace
- Small Quantity Onsite Burner Exemption: Unknown
- Smelting, melting, Refining Furnace Exemption: Unknown

Used Oil Activities

Used Oil Transporter Activity
- Transporter: No
- Transfer Facility: No

Used Oil Processor and/or Re-refiner Activity
- Processor: No
- Refiner: No

Off-Specification Used Oil Burner: No

Used Oil Fuel Marketer Activity
- Marketer who directs shipment off-specification used oil to off-specification used oil burner: No
- Marketer who first claims the used oil meets the specifications: No

Underground Injection Control: No

Destination Facility for Universal Waste: Unknown

*** End of Report ***

ATTACHMENT 11 Page 5 of 5

HANDLER INFORMATION REPORT November 17, 2004

PROCEDURES for Inspectors/Investigators/etc. performing Site Visits

Present the Facility representative with a copy of their:

- Handler Information Report (attached)
- Copy of the current Notification Form (attached)
- Copy of the current Notification Booklet (attached)

Our instructions to them are printed on their Handler Information Report - and should be self explanatory. If the facility wants to revise their Handler Information Report, they can do so and mail it back to EPA - or have the inspector deliver it.

If during the course of the site visit, the inspector/investigator becomes aware of any changes which should be made to the information printed on this form, please make the corrections and return the form to: Cynthia Sehnert-Jones, ARTD/RESP.

EPA RCRA ID Number: IAD005263751

Name of Company/Site: ALTER METAL CO
Location of Site: 640 SCHMIDT RD
DAVENPORT, IA 52802
SCOTT County

Land Type:

NAICS: 42193 - Recyclable Material Wholesalers

Mailing Address: 2333 ROCKINGHAM ROAD
DAVENPORT, IA 52808

Site Contact: CHRIS MOREHOUSE PLANT MANAGER
Address: ~~Same as Mailing Address~~ 624 SCHMIDT ROAD

Current Owner of Site: ALTER METAL COMPANY
Owner Type: Private

Current Operator of Site:
Address:

Operator Type:
TYPE(S) OF REGULATED ACTIVITY: ~~None~~ USED OIL DOOL

Hazardous Wastes Handled:

I 11/08/02 N

Certified by State/EPA on 11/08/02 by

ATTACHMENT 13 Page 1 of 1

Date of Site Visit: 12-1-04

Name of Inspector (Please print): GLENN CHERNY

(Check one): ☐ EPA R7 ENSV ☐ EPA R7 Contractor ☒ NOWCC/SEE Investigator

Signature of Inspector: Glenn Cherny


Capacitors
Active 22October2004
CAUTION
CONTAINS
PCBs
(Polychlorinated Biphenyls)
A toxic environment contaminant requiring special handling and disposal in accordance with U.S. Environmental Protection Agency Regulations 40 CFR 761. For Disposal Information contact the nearest U.S. E.P.A. Office.
In case of accident or spill, call toll free the U.S. Coast Guard National Response Center: 800-424-8802
Also Contact
Tel. No.


THERMOCOUPL
CAPACITORS
Active 22October 2004
CAUTION
PCBs
BALLAST
Active 22October 2004
CAUTION
PCBs


ALTER
SCRAP PROCESSING
640 Schmidt Road


12 1'04


USED
OIL


SAFETY-KLEEN
PARTS CLEANING SOLVENT
UL


USED
OIL
12 '04